

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA,                  )  
    )  
    )  
    )  
v.     ) CRIMINAL NO. 1:16-cr-20-AJT  
JOSEPH HASSAN FARROKH,                )  
    )  
    )  
Defendant.                                 )

**DEFENSE EXHIBITS FOR MEMORANDUM IN AID OF SENTENCING**

**EXHIBITS A - M**

# **EXHIBIT A**

**Gregory Brian Saathoff M.D.**

Citizenship: United States of America

**POSITIONS**

Associate Professor of Research  
Department of Public Health Sciences  
University of Virginia School of Medicine  
Charlottesville, Virginia  
Appointed September 2011-present

Associate Professor of Research  
Department of Emergency Medicine  
University of Virginia School of Medicine  
Charlottesville, Virginia  
Appointed November 2007- present

Visiting Professor  
Department of Faculty of Arts, Computing, Engineering, and Sciences  
Sheffield Hallam University  
Sheffield, United Kingdom  
Appointed March 2014- present

Executive Director  
Critical Incident Analysis Group (CIAG)  
University of Virginia  
Charlottesville, Virginia  
1997-present

Conflict Resolution Specialist  
Critical Incident Response Group  
Federal Bureau of Investigation  
July 1996-present

National Security Expert Panel Member  
Oak Ridge Associated Universities  
2007-present

Psychiatric Consultant  
Virginia Department of Corrections  
Medium, Maximum, and Super-Maximum Facilities in Virginia  
Psychiatric Assessment, Consultation, UVA Medical Student Teaching  
1991-present

- Psychiatric Advisor**  
Virginia Department of Corrections  
Project Consultant on Least Restrictive Measures for Segregation  
2013-2014
- Psychiatric Consultant**  
U.S. Bureau of Prisons  
2014-2015
- Associate Professor of Research**  
Department of Psychiatry and Neurobiological Sciences  
University of Virginia School of Medicine  
Charlottesville, Virginia  
Appointed April, 2002-September 2011
- Associate Professor of Clinical Psychiatry**  
Department of Psychiatric Medicine  
University of Virginia School of Medicine  
Charlottesville, Virginia  
1987-2002
- Faculty Associate**  
Center for the Study of Mind and Human Interaction  
University of Virginia  
Charlottesville, Virginia  
1993-2002  
Member-Kuwait Project
- Director**  
Followers Program (Diagnostic Assessment of Violent Stalkers)  
Department of Mental Health, Mental Retardation & Substance Abuse Services  
Commonwealth of Virginia  
1994-2002
- Member**  
Baltic Project (Estonia)  
Center for the Study of Mind and Human Interaction  
The Carter Center  
Atlanta, Georgia  
1995-1998

**Member**

Former Soviet Union Project—(Republic of Georgia)  
Tblisi, Georgia  
1999

**Medical Director**

Kuwait PTSD Project 1994-1996  
Social Development Office-Kuwait  
Arab Peninsula and Gulf Studies Program

**Psychiatric Forensic Consultant**

Federal Bureau of Investigation  
National Center for the Analysis of Violent Crime (NCAVC)  
Operation New Hope, 1993-1995

Crisis Management Unit/Investigative Support Unit  
Critical Incident Response Group  
Operation Gray Sunset, Jordan, Montana, 1996

Crisis Management Unit / Investigative Support Unit  
Critical Incident Response Group  
HOBAS Project, Montreal, Quebec, 1996

Crisis Management Unit/Investigative Support Unit  
Critical Incident Response Group  
US Air Force, Profiling & Behavioral Assessment Unit, 1997

Crisis Management Unit/Investigative Support Unit  
Critical Incident Response Group  
Republic of Texas Siege, 10 April 1997

Macro Task Force—on-site consultation  
Western Australia Police Service  
Perth, Western Australia  
3-7 October 1999

**Faculty Review Committee Member**

FBI Behavioral Sciences Faculty Review Committee  
University of Virginia  
Charlottesville, Virginia  
December 1998-2000

**Psychiatric Consultant**  
Bureau of Criminal Investigation  
Department of State Police/Capitol Police  
Commonwealth of Virginia  
1984-1987

**Assistant Clinical Professor**  
Department of Family Medicine  
University of Virginia School of Medicine  
Charlottesville, Virginia  
1987-1995

**Major**  
United States Army Reserves  
Medical Corps-Psychiatry  
1985-1994  
Active Duty-Operation Desert Storm 1991

**Psychiatric Consultant**  
Visiting Professor  
Saudi-U.S. Universities Project  
King Faisal Specialists Hospital  
Riyadh, Saudi Arabia  
March-June 1995

**Research Article Reviewer**  
Annals of Saudi Medicine  
Riyadh, Saudi Arabia  
1995

**Psychiatry**  
Interpersonal and Biological Processes  
Robert Ursano MD, Editor  
2007

**Harvard Review of Psychiatry**  
Dr. Shelly Greenfield, Editor in Chief  
2010- Present

## **EDUCATION**

### **Undergraduate Education**

University of Notre Dame  
Arts and Letters, Pre-Professional Studies Program  
Notre Dame, Indiana  
B.A. Psychology 1976-1979

### **Graduate Education**

University of Missouri-Columbia  
School of Medicine  
Columbia, Missouri  
M.D., 1979-1983

### **Post-Graduate Education**

University of Virginia  
Residency in Behavioral Medicine & Psychiatry  
Charlottesville, Virginia  
Psychiatry, 1983-1987

## **PROFESSIONAL CERTIFICATION**

### **Medical Board Examination**

Diplomate  
National Board of Medical Examiners  
1984

### **Specialty Board Examination**

Diplomate  
American Board of Psychiatry and Neurology  
1989

### **Forensic Evaluation**

Institute of Law, Psychiatry and Public Policy  
University of Virginia  
Risk Assessment  
Institute of Law, Psychiatry and Public Policy  
University of Virginia

### **Sex Offender Evaluation and Treatment**

Institute of Law, Psychiatry and Public Policy  
University of Virginia

## **MEDICAL LICENSURE**

Commonwealth of Virginia  
State Board of Medicine

## **PROFESSIONAL ORGANIZATIONS**

American Psychiatric Association  
Virginia Psychiatric Association  
Blue Ridge Psychiatric Society  
National Alliance for the Mentally Ill  
International Society of Traumatic Stress Studies  
Group for the Advancement of Psychiatry  
American Academy of Psychiatry and Law

## **AWARDS & HONORS**

### **The Army Commendation Medal:**

"in support of Operation Desert Storm"  
5th General Hospital,  
7th Medical Command  
Bad Cannstatt, Germany  
1991

### **Scroll of Appreciation**

"in support of Operation Desert Storm,"  
7th Medical Command  
1991

### **Certificate of Recognition**

Bad Cannstatt Meddac,  
for exemplary service from  
January 1991 to April 1991,  
in support of "Operation Desert Storm"

**National Defense Service Medal, 1991, Germany.**

**Overseas Service Ribbon, 1991, Germany.**

### **Plaque of Recognition**

"For your knowledge, insight, and devotion"  
Critical Incident Response Group  
Federal Bureau of Investigation  
1995

**Certificate of Commendation**  
Louis Freeh-Director  
Federal Bureau of Investigation  
1999

**Plaque of Recognition**  
For Service and Commitment to the Task Force  
Western Australia Police Service  
Macro Task Force  
1999

**Commonwealth of Virginia General Assembly House Joint Resolution 924**  
"Under the direction of Dr. Greg Saathoff, the General Assembly commend the Critical Incident Analysis Group of the University of Virginia School of Medicine"  
Unanimous confirmation 22 February 2003

**Certificate of Commendation**  
Robert Mueller-Director  
For Exceptional Service in the Public Interest  
November 2005

**Letter of Appreciation**  
Federal Bureau of investigation  
Washington Field Office  
12 July 2006

**Award for Exceptional Service in the Public Interest**  
Presented by CIAG co-chair, Edwin Meese III  
10<sup>th</sup> Annual Meeting  
Critical Incident Analysis Group  
University of Virginia  
1 April 2007

**Election as IIA Fellow, James Madison University**  
National Academy of Sciences  
15 May 2007

**Certificate of Commendation**  
Presented by FBI Assistant Directors Robert A. Blecksmith and John G. Perren  
For Service as Chair of Independent Expert Behavioral Analysis Panel  
Which examined the anthrax attacks against America in 2001  
From 2009-2011  
Washington, D.C.  
Presented 6 December 2012

## **EDITORIAL BOARDS**

Member-Editorial Board  
International Journal of Emergency Mental Health

## **NON-PROFIT BOARDS**

President-Research Strategies Network

Executive Board Member-Parade Rest VA

Board Member

Center of Excellence in Terrorism, Resilience, Intelligence, and Organized Crime Research (CENTRIC)-Sheffield Hallam University, Sheffield, U.K.  
2013-present

## **ADVISORY POSITIONS**

Advisor

PBS Documentary: America at the Crossroads  
Homegrown: Islam in Prison  
First Aired 26 November 2007

Contributor

BBC Documentary: Psychopath  
First Aired 2007

Peer Reviewer

National Institute of Justice  
Syracuse University Grant: Violent Speech Biometrics Forensic Linguistic and Psychiatric Analysis Project  
May 2013

## **SECURITY CLEARANCES**

Available on authorized request

## **COMMITTEE / COMMISSION APPOINTMENTS AND ELECTIONS**

Principal Investigator

ATHENA Project (EU FP7 Project)  
West Yorkshire Police, Leeds, U.K.  
Appointed 2014

**Chairman**  
General Faculty Council  
University of Virginia  
2014-2015

**Lecturer**  
FBI National Center for the Analysis of Violent Crime (NCAVC)  
Phase 1 Training-Psychopathology  
2000- present

**Appointed Member**  
Provost's Taskforce on Non-Tenure Track Faculty (NTTF)  
University of Virginia  
Appointed 2013-present

**Elected Member**  
General Faculty Council  
University of Virginia  
Elected 2011- present (term expires 2016)

**Member (& Chairman 2000-2005)**  
International Relations Committee  
Group for the Advancement of Psychiatry (GAP)  
White Plains, New York  
1997-present

**Chair**  
Expert Behavioral Analysis Panel  
Multidisciplinary Panel Charged with Sealed Records Analysis and Review  
via court authorization of Chief Judge Royce Lamberth  
September 2009-June 2010

**Chair**  
Pharmacy and Therapeutics Committee  
Western State Hospital  
2000-2002

**Member**  
Select Advisory Commission to the FBI's Critical Incident Response Group (CIRG)  
FBI Academy  
Quantico, Virginia  
16-18 January 1996, 16-18 February 1996

**President**

Medical Staff  
Western State Hospital  
University of Virginia  
1989-1991

**TEACHING ASSIGNMENTS**

**Coordinator and Clinical Teacher**

Mental Health Treatment in the Prison Setting  
3<sup>rd</sup>-year Clerkship, UVa School of Medicine  
1992-present

**Course Coordinator**

Psychiatry-Saudi U.S. Universities Project  
King Faisal Specialists Hospital  
Riyadh, Saudi Arabia  
March-June 1996

**Coordinator of Teaching Component**

Psychopharmacology Education  
University of Virginia-Department of Family Medicine  
Charlottesville, Virginia  
1987-1996

**Lecturer and Participant**

Hostage Negotiation Course  
Crisis Management Unit-FBI  
22 January-2 February 1996

**Lecturer**

Virginia Department of State Police Academy  
Richmond, Virginia  
1986-1987

**PRESENTATIONS (chronological order)**

**Paper Presentation**

**Psychiatric Sequelae in State Police Officers**  
141st Annual Meeting  
American Psychiatric Association  
Montreal, Quebec  
9 May 1988

Paper Presentation

**Geriatric Deinstitutionalization and Mortality**

144th Annual Meeting  
American Psychiatric Association  
New Orleans, Louisiana  
13 May 1991

Paper Presentation

**Limiting Regression of Borderline Inpatients**

145th Annual Meeting  
American Psychiatric Association  
Washington, D.C.  
6 May 1992

Lecturer

**Dealing with the Borderline Personality**

11th Annual Refresher Course for Family Physicians  
University of Virginia  
Charlottesville, Virginia  
6 May 1993

Lecturer-Workshop

**Erotomania, The Celebrity Stalker, and the Law**

146th Annual Meeting  
American Psychiatric Association  
San Francisco, California  
24 May 1993

Chair-Workshop

**Academic Psychiatry Behind Bars**

146th Annual Meeting  
American Psychiatric Association  
Philadelphia, Pennsylvania  
24 May 1994

Chair-Workshop

**Final Frontier? Collaboration in Prison Psychiatry**

146th Annual Meeting  
American Psychiatric Association  
Philadelphia, Pennsylvania  
24 May 1994

Speaker-Workshop Presentation

**The Management and Treatment of Stalkers**

A Video Case Presentation

Institute of Law, Psychiatry, and Public Policy

Thirtieth Semi-Annual Forensic Symposium

Charlottesville, Virginia

10 May 1996

Presenter

**"Role of the Conflict Resolution Specialist"**

FBI Critical Incident Response Group Retreat

St. Michael's, Maryland

15 October 1997

Forum Coordinator

**"Critical Incidents and the Constitution"**

1<sup>st</sup> Annual CIAG Conference

Academical Village, University of Virginia

Charlottesville, Virginia

8-9 January 1998

Coordinator/Moderator

**"Aum Shinrikyo and the Sarin Gas Attack"**

**"The Changing Face of Terrorism"**

FBI Academy

Quantico, VA

26 February 1998

Lecturer

University of Virginia-Associates Program

**Violence and Myth in America: From Culture to Cell**

1 March 1999, Richmond, Virginia

23 March 1999, Norfolk, Virginia

31 March 1999, Falls Church, Virginia

Moderator-Presenter

**The Terrorist Threat to the American Presence Abroad**

2<sup>nd</sup> Annual CIAG Conference

University of Virginia, Omni Hotel

Charlottesville, Virginia

12-13 April 1999

Moderator

**Apocalyptic Millennialism and Violence Conference**  
Federal Bureau of Investigation  
Fredericksburg, Virginia  
7 June 1999

Presenter

**Resolution Strategies in Religious Barricades**  
Conference on Apocalyptic Millennialism  
**The Case of Jerusalem in 2000**  
Jerusalem, Israel  
20-23 June 1999

Moderator-Behavioral Science Panel

US Department of Justice/FBI Conference  
**"The School Shooter: A Threat Assessment Perspective"**  
Leesburg, Virginia  
12-16 July 1999

Moderator/Panelist-Critical Incident Analysis Group

**Profile of the Rabin Assassination**  
Critical Incident Analysis Group  
North Oval Room, Rotunda, University of Virginia  
Charlottesville, Virginia  
28 July 1999

Coordinator

**FBI-Religion Scholar Interface of Apocalyptic Millennialism**  
Roundtable Seminar-American Academy of Religion  
AAR Annual Meeting-Boston, Massachusetts  
20-23 November 1999

Moderator-Panelist

With Robert Hare, PhD, and  
FBI's National Center for the Analysis of Violent Crime  
**Symposium on Psychopathy**  
University of Virginia  
Charlottesville, Virginia  
19 January 2000

Moderator

**"Protecting Symbols of American Democracy"**

3<sup>rd</sup> Annual CIAG Conference  
University of Virginia  
Charlottesville, Virginia  
10-11 April 2000

Guest Speaker

**"Public Figure Stalking"**

The Washington D.C. Conference on Threat Management  
12 May 2000

Lecturer

**"Profile of a Stalker"**

Summer Institute on Stalking: Virginia Department of Criminal Justice Services  
Newport News, Virginia and Roanoke, Virginia  
13 July 2000 and 10 August 2000

Panelist-Press Conference

**The School Shooter: A Threat Assessment Perspective**

Federal Bureau of Investigation  
J. Edgar Hoover Building  
Washington D.C.  
Televised 6 September 2000

Moderator and Discussant

With Hussah Al-Salem Al-Sabah, Professor Basheer Al-Rashidi, Bertram Brown

**"Preserving Identity and Culture in the Face of Trauma"**

**"The Liberation of Kuwait: Dawning of a New World Order?"**

Commemoration of Tenth Anniversary of Gulf War Victory  
Institute for Global Policy Studies  
University of Virginia  
Charlottesville, Virginia  
23 January 2001

Guest Speaker-Panelist

**"The Changing Role of Physicians During Times of Conflict"**

University of Virginia Medical Alumni Association-38<sup>th</sup> Annual Meeting  
Norfolk, Virginia  
27 January 2001

Moderator

**“Public Responsibility and Mass Destruction:  
Facing the Threat of Bioterrorism”**

4<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, Virginia

2-3 April 2001

Lecturer

**“Psychiatric Guidance for Supervisors”**

FBI-BIA Symposium

FBI Academy Quantico, Virginia

11 September 2001

Lecturer

**“Respecting Arab Culture: The Interview”**

Critical Incident Response Group-FBI

27 September 2001

Discussant

**Killing in the Name of God**

American Academy of Psychiatry and the Law

Annual Meeting

Boston, Massachusetts

25 October 2001

Presenter

**“Mental Health, Law Enforcement and Media Perspectives on  
Debriefing”**

“Debriefing Needs within the CIRG”

International Society for Traumatic Stress Studies

Annual Meeting

New Orleans, Louisiana

7 December 2001

Speaker

**“Biological Weapons: Threat and Response, Bioethics and  
Bioterrorism”**

Conference, University of Pennsylvania and University of Virginia

Departments of Biomedical Ethics, National Press Club

Washington D.C.

28 February 2002

Conference Coordinator and Moderator

**Terrorism Intelligence and Democracy**

5<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

9 April 2002

Moderator

**Conference on Workplace Violence**

Critical Incident Response Group

Federal Bureau of Investigation

U.S. Department of Justice

Lansdowne Resort

Leesburg, Virginia

9-14 June 2002

Speaker

**The Mind of the Terrorist**

Fall Meeting, Psychiatric Society of Virginia,

Boar's Head Inn

Charlottesville, Virginia

27 September 2002

Speaker

**Community Shielding: Public Response to Bioterrorism**

International Open Discussion On:

"International Terrorism and World Governance"

U.N. Interregional Crime and Justice Research Institute/Europol

Turin, Italy

7 February 2003

Conference Coordinator and Moderator

**Communication in Crisis: Mobilizing Resources**

6<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

31 March 2003

Speaker

**Iraq's Mental Wellbeing Training Symposium on Trauma**

SAS Radisson Hotel

Kuwait

11-13 October 2003

Speaker

**Understanding Symptoms of Mental Illness:  
Therapeutic Approaches for Law Enforcement**

Metropolitan Area Crisis Negotiators Association

The Pentagon

Arlington, Virginia

21 October 2003

Conference Coordinator and Moderator

**Countering Suicide Terrorism: Risks, Responsibilities and Realities**

7<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

4-6 April 2004

Paper Presentation

**Mental Illness and Vulnerability to Victimization**

Dubai Police Academy

Dubai, UAE

5 May 2004

Conference Coordinator and Moderator

**Hostage to Terrorism: Governmental and  
Non-Governmental Response Strategies**

8<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

3-5 April 2005

Panelist

**New Directions in Psychiatric Aspects of Terrorism: Causes,  
Consequences, Responses**

2005 Annual Meeting of American Psychiatric Association

Atlanta, Georgia

26 May 2005

Chairman

**Terrorism and the Unknown Enemy**

29<sup>th</sup> International Congress

Académie internationale de droit et de santé mentale

Sorbonne

Paris, France

7 July 2005

Moderator

Community Shielding and Evacuation: Two Sides of the Preparedness Coin  
**Catastrophe: Coping Through Improvisation**

Darden School of Business  
University of Virginia  
Charlottesville, Virginia  
17-18 October 2005

Keynote Speaker

*Collision, Collusion or Collaboration?*  
Academe, Private Sector and Government-  
*The Critical Incident Analysis Group*

**Senior Course on Crisis Management and Civil Emergency Planning:**  
**Facing new security threats and risks**

Swedish National Defense College  
Stockholm, Sweden  
5 December 2005

Conference Coordinator and Moderator

9<sup>th</sup> Annual CIAG Conference  
**Critical Intelligence, Communication and Response: Formatting Lessons of**  
**the Recent Terrorist Attacks to Future Threats**

University of Virginia  
Charlottesville, Virginia  
2-4 April 2006

Exercise Facilitator

Four Day Table Top Exercise and Senior Leadership Briefing  
**“Operation Avian Wind”**  
U.S. European Command  
Marshall Center, Garmisch, Germany  
June 2006

Testimony

**Religious Radicalization Behind Bars**

Testimony Before the Senate Committee on Homeland Security and Governmental Affairs  
Dirksen Senate Office Building  
Washington, D.C.  
19 September 2006

Presenter

**Anatomy of a Medical Murder: Case Presentation of Serial Medical Homicides of Medical Student and Physician Michael Swango, MD**  
Old Medical School Auditorium  
University of Virginia School of Medicine  
Charlottesville, Virginia  
20 September 2006

Grand Rounds

**Medical Students in Prison: Fifteen Years of Teaching 3<sup>rd</sup> Year UVa Students**  
Department of Psychiatry and Neurobehavioral Sciences  
University of Virginia  
Camp Heart Auditorium  
Charlottesville, Virginia  
10 October 2006

Seminar Chairman

**Crisis Leadership: Securing Societies, Protecting Homelands**  
Center for the Study of the Presidency  
U.S. Capitol Building, Room HC-8  
19 March 2007

Conference Coordinator and Moderator

**Root, Stem and Branch: Home-Grown Radicals and the Limits of Terrorism**  
10<sup>th</sup> Annual CIAG Conference  
University of Virginia  
Charlottesville, VA  
1-3 April 2007

Presenter

**Students in Distress, Mental Health, and Law Reform**  
Miller Center Forum  
University of Virginia  
Miller Center of Public Affairs  
Charlottesville, Virginia  
25 June 2007

Briefing

**Community Shielding and the Work of CIAG**  
Duncan Lewis, Deputy Prime Minister, Australia  
Co-Chair; Australian National Counterterrorism Committee  
Perth, Western Australia  
23 August 2007

Conference Director and Moderator

**Avenues for Dialogue: Driving Discourse Toward Peaceful Goals**

London

5-7 November 2007

Conference Director and Moderator

**Avenues for Dialogue: Driving Discourse Toward Peaceful Goals**

Washington, D.C.

13 December 2007

Testimony

**U.S. Prisoners and Religious Rights**

Testimony Before the U.S. Commission on Civil Rights

Washington, D.C.

8 February 2008

Conference Director and Moderator

**Avenues for Dialogue: Driving Discourse Toward Peaceful Goals**

Riyadh, Saudi Arabia

25-28 February 2008

Conference Director and Moderator

**Cyber Incursions: Erosions of Security and Social Trust?**

11<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

30 March-1 April 2008

Conference Director and Moderator

**Suicide by Cop: Averting the Crisis**

CIAG Winter Symposium

University of Virginia

Charlottesville, VA

7-9 December 2008

Co-Moderator

**Human Factors in Marketing, Psychology, and Sociology**

FEMA Region V Preparedness Summit: Developing a Culture for Preparedness

Chicago, Illinois

6 January 2009

Conference Director and Moderator

**Resolving Hostage Crises: Lessons from Colombia**

12<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

29-31 March 2009

Conference Director and Moderator

**21<sup>st</sup> Century Piracy: Lessons off the Somali Coast**

13<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

21-23 March 2010

Guest Speaker

**Mainstreaming Counter-Terrorism in Police and Law Enforcement**

Asia-Pacific Programme for Senior National Security Officers

Sentosa Resort and Spa

Singapore

13 April 2010

Guest Speaker

**Crisis Leadership**

FEMA Office of the Chief Counsel Annual Meeting

Boar's Head Inn

Charlottesville, Virginia

14 May 2010

Conference Director and Moderator

**Insider Threats**

14<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, Virginia

3-5 April 2011

Speaker

**Personnel Reliability and the Anthrax Attacks:**

**Report of the Expert Behavioral Analysis Panel**

*Federal Experts Security Advisory Panel and National Security Advisor/Staff*

HHS Building, Washington D.C.

18 April 2011

Conference Co-Director

**Advice in Crisis Training Session**

Annual Training Session

Federal Emergency Management Agency

Charlottesville, Virginia

10-13 May 2011

Presenter

**Biological Threats to U.S. Interests: Sharing Information and Improving Partnerships Bio Science Conference**

Classified Briefing

25 May 2011

Guest Speaker

**Evaluating Insider Risk: Dr. Ivins and Amerithrax”**

DARPA Briefing for Government Biodefense Leadership

Arlington, VA

25 May 2011

Guest Speaker

**“Expert Behavioral Analysis Panel Review of Bruce Ivins, Ph.D.”**

Human Reliability / Insider Threat Technical Exchange

Defense Threat Reduction Agency

United States Strategic Command

Fort Belvoir, Virginia

30 June 2011

Conference Director and Moderator

**“Leadership and Advice in Crisis: Assessing the Impact of Communications Technology in an Age of ‘Wireless’ Governance”**

Special CIAG Symposium

University of Virginia

Charlottesville, Virginia

14-16 September 2011

Conference Director and Presenter

**Terrorism on Trial: Case Presentations**

Special CIAG Symposium for FBI-Critical Incident Response Group

Charlottesville, Virginia

6 October 2011

Grand Rounds

**"The Amerithrax Case"**

With Ronald Schouten MD JD, Christopher Holstege MD, and David Willman  
University of Virginia School of Medicine

Charlottesville, VA

21 March 2012

Presenter

**"The Amerithrax Case and Lessons Learned"**

With Ronald Schouten MD JD, Christopher Holstege MD, and David Willman  
University of Virginia School of Law

Charlottesville, VA

21 March 2012

Conference Director and Moderator

**"Federal Critical Incident Response and the CIRG"**

15<sup>th</sup> Annual CIAG Conference

University of Virginia

Charlottesville, VA

25-27 March 2012

Presenter

**Chemical Biological Medical Treatment Symposium IX: Insider Threats**

With Christopher Holstege MD and Ronald Schouten MD JD

Spiez, Switzerland

7 May 2012

Grand Rounds

**"The Amerithrax Case and Insider Threats"**

Boston University School of Medicine

Cambridge, Massachusetts

24 MAY 2012

Presenter

**"Insider Threats: Lessons from Amerithrax"**

With Ronald Schouten MD JD

2012 Threat Management Conference

Association of Threat Assessment Professionals (ATAP)

Anaheim, California

15 August 2012

Presenter

**"Sirens, Scylla, and Charibdis: Navigating National Security through the Straits of Critical Incident Analysis"**

Leaders and Terrorists: Psychological Perspectives on National Security

Part 1: The Terrorist

Embassy of Italy

Washington, D.C.

29 January 2013

Presenter

**Targeted Shooter Symposium**

National Center for the Analysis of Violent Crime

Federal Bureau of Investigation

Quantico, Virginia

25 March 2013

Presenter

**Ethical and Methodological Issues when Clinicians and Researchers Lend their Skills to Studying and Attempting to Prevent Terrorism**

Society for Terrorism Research 7th Annual Conference

University of East London

London, United Kingdom

27 June 2013

Presenter

**Mass Shooters**

Walter Reed National Military Medical Center

Bethesda, Maryland

29 May 2013

Presenter

**Behavioral Characteristics of Targeted Shooters**

Law Enforcement Partner's Day, FBI Headquarters

Quantico, Virginia

10 July 2013

Invited Speaker

**The Amerithrax Case and Insider Threat**

Annual Medical School Scientific Program

University of Missouri School of Medicine

Columbia, Missouri

25 October 2013

Conference Director & Moderator

**Challenges and Innovations in Urban Crime**

Law Enforcement Action Network (LEAN) and Research Strategies Network (RSN)

University Club, Washington, D.C.

5 November 2013

Presenter

Critical Incident Analysis Group/Research Strategies Network

ATHENA Project Kick-Off Meeting

Leeds, United Kingdom

21 January 2014

Guest Lecturer

**Insider Threat and Bioterrorism**

The Center for Non-Proliferation Studies

Washington, D.C.

6 March 2014

Presenter

**The Role of the Perpetrator**

Children and Long Term Abductions

National Center for Missing and Exploited Children

Alexandria, Virginia

23 April 2014

Presenter

**FBI Threat Assessment Presentation**

Atlantic Coast Conference University Emergency Preparedness and Emergency

Response Conference

University of Virginia

Miller Center

Charlottesville, Virginia

18 June 2014

Co-Conference Director, Co-Moderator, and Presenter

**Anthrax and Insider Threat**

The American Red Cross National Headquarters and the U.S. Capitol

With the U.S. Capitol Police and the U.S. Senate Sergeant at Arms

Washington, D.C.

20 June 2014

Presenter

Center of Excellence in Terrorism, Resilience, Intelligence and Organized Crime Research (CENTRIC) Conference on **The Future of Policing**  
SAP Office, United Kingdom  
Middlesex, United Kingdom  
9 July 2014

Keynote Speaker

**Detecting Lethal Strains in the Lab: A Behavior Analysis of Insider Threat in the Anthrax Letter Attacks of 2001**  
*Fritz Dreifuss Lecture*  
Virginia Neurological Society Annual Meeting  
The Homestead, Hot Springs, VA  
31 January 2015

Director and Presenter: FBI Symposium

**The Power of Prevention: Threat Management Strategies to Disrupt Targeted Shootings** University of Virginia, 26-28 July 2015

Keynote Speaker: University of Oxford

**Managing Extreme Thinking and Behavior- CIAG and the US experience**  
Harris Manchester College  
September 15, 2015

Course Presenter

**In Plain Sight: Crimes Against Children**  
Judge Advocate General School, University of Virginia  
October 5 and 29, 2015

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# **EXHIBIT B**

**Gregory Saathoff M.D.**

PO Box 800657  
Charlottesville, Virginia 22903

July 7, 2016

Joseph T. Flood, Esq.  
Sheldon, Flood & Haywood, PLC  
10621 Jones Street, Suite 301-A  
Fairfax, Virginia 22030

*Re: United States v. Joseph Hassan Farrokh*  
Case Number 1:16-cr-20-AJT

Mr. Flood,

At your request and pursuant to the appointment order, I have completed a pre-sentencing forensic psychiatric evaluation of Joseph Hassan Farrokh, who recently pleaded guilty to one-count of Conspiracy to Provide and Attempt to Provide Material Support to a Foreign Terrorist Organization, in violation of Title 18, U.S.C, Sections 2339A(b) and 2339B. This evaluation addresses one primary question, related to Mr. Farrokh's likelihood of recidivism, and, to the extent my evaluation touches on related sentencing issues, you have asked me to opine on related sentencing issues. In particular, you asked (consistent with the language from the Federal Sentencing Guidelines):

1. The prospect of Mr. Farrokh's recidivism in areas of terrorism- related activity.
2. Whether reliable information indicates Mr. Farrokh's criminal history category substantially over represents the likelihood that he will commit other crimes in the future?
3. Whether reliable information indicates that Mr. Farrokh's criminal history category substantially over represents the seriousness of his criminal history?
4. Whether there is anything about the (a) nature and circumstances of the offense, or (2) the history and character of the defendant in mitigation that suggests a sentence below the guidelines is appropriate?

I met with Mr. Farrokh on 17,18 June 2016 for eleven hours at the Alexandria Detention Center (ADC) in Alexandria, Virginia. At the beginning of the evaluation, I explained to him the nature, scope and purpose of the evaluation, including the relevant limits of confidentiality and privilege. Mr. Farrokh conveyed a reasonable understanding of these arrangements, and he agreed to participate in the evaluation. Based upon my evaluation and the analysis below, it is my

professional opinion, within a reasonable degree of psychiatric certainty, that the nature and circumstances of the offense and the history and character of the defendant suggest consideration of a downward departure below the current guidelines.

In addition, I am of the opinion that reliable information indicates that his prior criminal history category both over represents the seriousness of his criminal history as well as the likelihood that he will commit other similar crimes in the future. Lastly, based upon my clinical experience, and review of the current literature on relevant risk factors, the prospect of recidivism in terrorism-related activities is decreased relative to an age- matched cohort of those charged with terrorism-related crimes.

#### Summary Findings

#### **SOURCES OF INFORMATION**

1. Clinical interviews with Mr. Farrokh at the ADC on 17 and 18 June 2016; Gregory Saathoff MD.
2. Phone interview with Mr. Farrokh's father, Hashem Farrokh, on 26 June 2016.
3. Phone interview with Mr. Farrokh's mother, Donna Farrokh, on 26 June 2016.
4. Phone interview with Mr. Farrokh's oldest sister, Telat Skeith, on 26 June 2016.
5. Phone interview with Mr. Farrokh's older sister, Sara Hoekstra, on 26 June 2016.
6. Phone interview with Mr. Farrokh's wife, Saba Farrokh, on 26 June 2016.
7. Phone interview with Mr. Farrokh's former friend in California, Charles J Scott, on 3 July 2016.
8. Declaration of Charles J Scott, signed 1 July 2016.
9. Jail Records of Alexandria Detention Center including record of phone calls
10. Letter from Joseph Farrokh dated 15 June 2016, to the Senior U.S. Probation Officer.
11. Amended Senior US Probation Officer Pre-Sentence Investigation Report dated 7 June 2016.
12. Educational Records from Northern Virginia Community College (NOVA) dated 27 June 2016.
13. Educational Records from Diablo Valley College (DVC) from 2003, 2007, and 2011.
14. Educational Records and Certificate: America School of Nursing and Allied Health, 2014.
15. Declaration of Lindsay Page, dated 1 July 2016.
16. Protective Order signed by U.S. Federal Judge Brinkema, 25 February, 2016.

17. Transcripts of fall 2015 Meetings between Joseph Farrokh and government agents, declassified for expert review of this case, received 15 June 2016.
18. DVD and audio of Fall 2015 Meetings between Joseph Farrokh and US government agents, declassified for expert review of this case, received 15 June 2016.
19. Nursing assistant employment witness declaration of Esi Gyenin, dated 2 July 2016.
20. Nursing assistant employment witness declaration of Monica Hixon, dated 2 July 2016.
21. Nursing assistant employment witness declaration of Hamid Mackay, dated 2 July 2016.
22. Report of Mental Health Forensic Evaluation by Dr. Sahair Monfarad, dated 6 July 2016
23. Letter of Joseph Farrokh to Judge Trenga, (undated) received 5 July 2016
24. Phone interview with C.J. Scott, 3 July 2016.

**BACKGROUND**  
Family, Developmental and Social History

In order to gain insight into Mr. Farrokh's behavior relating to his attempted travel to Syria in January 2016 for the purpose of supporting ISIL, his family developmental and social history is relevant. I have read Dr. Monfarad's report and its assessment is consistent with my own findings. My interviews with Mr. Farrokh, his family members, as well as the pre-sentence investigation report also provide factual and contextual information, yielding greater clarity for my assessment of Mr. Farrokh. This section will provide a brief summary and complements the factual information from the Presentence Investigation Report and Dr. Monfarad's report, while providing context with information independently gained through my interviews.

In brief, Joseph Hassan Farrokh is a 29 year old married male and is the only son and youngest of three children born in Pennsylvania to Hashem Farrokh and Donna (LeBarron) Farrokh, now of Stafford Virginia.

By all accounts, Joseph's early childhood experiences in Pennsylvania were very positive, and his early life as the youngest child and only son reflected a stable and consistent background. His sisters and parents describe him as being quite popular, with many friends. In elementary and middle school, his mother recalled that he was a high achieving student academically, receiving the President Clinton Award for academic excellence at his elementary school. He achieved a brown belt in karate and played baseball for two summers. Notably, his sister Telat and Sara were 11 and 9 years older respectively. They recalled that as older sisters they were quite fond of him, but because of the age difference, did not maintain the same social groups growing up. When Joseph moved to live with his parents in California around 2000, his sisters were adults and remained in the east due to education and job-related commitments.

His father Hashem is of Iranian background and obtained his education and employment in the United States after moving to the U.S. in 1967 at the age of 25. A U.S. citizen, he was reared in the Shia Islamic tradition and practiced his faith in the U.S. Joseph's mother, Donna, comes from a Christian background. All three children were reared nominally as Muslims, but also celebrated Christian holidays. According to my interviews with family members, although the children attended Islamic Sunday School, none of the children identified strongly as Muslims as they grew into adulthood. Joseph recalled that he at times wore a cross around his neck, and told me that at the time of 9-11, when he was fourteen years old, none of his friends were aware of his father's identity as a practicing Muslim and that he did not personally identify as a Muslim during that period.

According to Joseph and his family members, his departure from Pennsylvania, in the middle of his 7<sup>th</sup> grade school year, was particularly painful for him. His father had been laid off from Lucent Technologies, and left to find work in California for a start up company. Joseph and his mother followed soon thereafter, and moved to live with his father in a small one-bedroom apartment. Compared to his prior neighborhood in Schnecksville, Pennsylvania, a suburb of Allentown, Richmond California was a more unstable, lower socioeconomic environment with higher crime and a poverty rate more than 12 times that of Schnecksville.<sup>1</sup> In addition to poverty, at that time, Richmond was noted to be a high crime area nationally. In 2004, it was ranked the 12<sup>th</sup> most dangerous city in America.<sup>2</sup> Four city counsel members requested that the governor of California declare the city of Richmond in state of emergency due to its high crime rate.<sup>3</sup>

In his interviews with me, Mr. Farrokh recalled that:

I moved from Pennsylvania to California in the middle of 7<sup>th</sup> grade, and I was upset. I remember the names of many friends [in Pennsylvania]. We were all straight A students, we played sports, we were the popular crowd...I remember that the teachers liked us...I always liked history and was good at math and science. When I was a child, after we moved to California and then my father moved to Virginia, that is when I had issues of anger.

We lived with my father in his one bedroom apartment in California. It was Richmond, California, a bad area. I remember feeling depressed in a way. I acted out. I guess I shouldn't have acted like that. I had some issues in leaving. I remember being really sad and missing my friends and everything in Pennsylvania. I started to talk back to my parents and not listen.

After losing his job and moving from Pennsylvania to Virginia, where he asked his family to join him, Joseph's father, Hashem, lost his job in California approximately two years later, and was

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<sup>1</sup> 2010-2014 American Community Survey 5-Year Estimates,  
[http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml), (Richmond, CA) and  
[http://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml#](http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#), Schnecksville, PA, accessed 2 July 2016.

<sup>2</sup> <http://journalism.berkeley.edu/ngo/2004/12/10/the-iron-triangle-richmonds-forgotten-neighborhood/> accessed 3 July, 2016  
It is important to note that although Richmond did have a very high crime rate in the first decade of the 21<sup>st</sup> century, the current crime rate has been dramatically decreased.

<sup>3</sup> <http://www.sfgate.com/bayarea/article/RICHMOND-4-on-council-call-for-a-state-of-2627613.php>

unemployed for a period of almost a year before he was able to finally obtain a job at the U.S Patent Office in Washington, DC.

In his telephone interview with me, Hashem recalled the transitions as being difficult for Joseph:

He took this very hard. He was unhappy with the move because he lost his friends. If I had to do it over again I don't think that I would have done that. (moved the family to California)

Joseph's mother, Donna, also recalled that the move was traumatic for Joseph, both in that he was quite attached to the Schnecksburg community and his friends there, but also because the Richmond California community was less safe, prompting her and Hashem to put him in a private school for six months, before transferring Joseph to yet another school, this time public.

When we were going to California he was upset, and didn't want to move. [Before leaving Pennsylvania] a friend threw him a party – I had no idea how popular a kid [Joseph] was. When he came home, he had a poster board that they had signed. They wrote really nice things on it. I felt "wow" and also sad for him.

When we first moved to California, we lived in a one-bedroom apartment. I was upset, Joseph was angry. He acted out and showed some anger. We put him in a private school, because we were in a part of a city in Richmond that wasn't good.

Between the beginning of 7<sup>th</sup> grade and 8<sup>th</sup> grade, Joseph had attended three different schools in three different cities. His mother described to me a continuously difficult period:

His father had a job in Silicon Valley, so he was always gone. Joseph would test me and tell me that he wasn't going to school.

I was sad and unhappy that we had moved there at first. I found a therapist for Joseph. She was in Berkeley. He went there for a while and she felt it was over and ended it. She thought he didn't need any more therapy. Then Hashem was out of work for a year [and then] found a job in Virginia.

Joseph's oldest sister Telat recalled this as a difficult time for the family.

I don't remember when we were in Pennsylvania that he ever had any outbursts...Later he seemed to have a lot of anger...Now I think that when he moved he was just basically an adolescent and his whole world was ripped away from him. My sister and I stayed behind. In that way, I feel bad...When my dad left, he [Joseph] didn't have any structure. He was left to his own devices. He was mad at my dad for uprooting him and then leaving. It was almost like he got stuck there at that age. He felt like a disappointment, and wasn't able to forge an identity – our family unit was broken. My sister and I grew up [in Pennsylvania] with the family there – it was intact. My brother didn't have that. My mother was working and he was a lost soul. He seemed to be angry with his whole family. We weren't there for him when we should have been.

One close friend from high school who maintained some contact with Joseph for a few years after graduation was CJ Scott. In my phone interview with Mr. Scott, he remembered Joseph as having an east coast accent that prompted others to call him "Jersey Joe." Joseph appears to have accepted this nickname in that he then began to portray himself as coming from New Jersey:

He told us that he was from New Jersey. I thought he grew up most in New Jersey. He presented himself as being Italian from New Jersey. He led us to believe that he was Italian. He was always wearing a Yankees hat. I am 99.9% positive that people in Benicia felt that he was from New Jersey. Everybody called him Jersey Joe.

Mr. Scott also recalled his friend Joseph as someone who would put on a “tough” façade, and that Joseph would speak approvingly of mafia culture based upon his watching of popular films:

Cops were always in our business – our outlook was “I can’t stand them.” He lived by the mob code – he got his whole code from mob movies – you don’t rat on your friends and you never talk to the police.

Joseph discussed his lack of acknowledgment of a Muslim identity in the following way:

In high school, I saw some Muslims who were teased. People would make some remarks about someone from the middle east – like something having to do with terrorists. So I kept my ethnicity secret, and didn’t share. My name is pronounced Farr-Oak, and not Farrhook. And I wasn’t religious, I wouldn’t call myself Muslim.

When I was younger, I wore a necklace with a cross – I thought it was cool. It didn’t matter to me, I obviously didn’t identify with Islam. My mother was raised Christian, she was raised protestant, but didn’t go to church too much. Maybe she believed and prayed, but we weren’t religious in any way. My father was Muslim – religion wasn’t a big thing. My father went to the mosque when we were in Pennsylvania, but not in California. He prayed and fasted at Ramadan.

In his interview with me, Mr. Scott emphasized the strong bond that Joseph Farrokh made with him and their core group of 10-15 friends.

The word that best describes him is “loyal.” That is the predominate word that sticks out in my head. In my friendship, it was the thing that stood out the most.

If he considered you a friend, he would do anything for you. He would cover for you, he would have your back if you had a disagreement with someone else. When it came to loyalty, he would be a 9 on a scale of 1-10. He took it to an extent where it was something that was an honorable trait. Loyalty to your friend, a good friend – he felt that held a lot of merit. Friends should do anything for each other.

Joseph told me that he had long felt that he was a disappointment to his parents. He felt that his mother particularly was critical towards him, causing him to feel that he was a failure.

My mother would tell me that I wouldn’t amount to anything. I feel bad to say bad things about my parents, but there were times when they made me feel that way. My father wouldn’t call me names –[but] she would call me lazy and “good for nothing.”

Although his father and both sisters lived far from California, they did have opportunities to occasionally visit with him. Family members all reported that he was unhappy and he seemed to be in search of an identity. As Telat recalled to me during our phone interview:

It seemed that he went from one thing to another. He has always been like a lost soul. Even when he was in California, he would go from one group to another. He was acting like he was Mexican and then at my wedding he had slicked back hair, like Al Pacino.<sup>4</sup>

Joseph's sister Sara also independently recalled his search for identity, and his need to belong:

He went from one group of friends to another. He was into mafia movies for a while, and then it seemed like he was hanging out with a bunch of Hispanics. It was almost like he took on this new personality. If you didn't know better, you would think that he was Hispanic.

His friend from California, C.J. Scott, echoed the observations of Telat and Sara:<sup>5</sup>

Joseph tried to fit in with everyone else. Joseph spoke with an east coast twang, so everyone called Joseph "Jersey Joe."

For a period of time Joseph and I worked at the same restaurant. Joseph was really a hard worker and showed up every day. While working in the kitchen, Joseph befriended a few Hispanic employees who he was working with. While hanging out with his Hispanic friends, Joseph quickly learned to speak Spanish and then used this to translate for the other employees who only spoke English.

#### EDUCATION AND EMPLOYMENT

Joseph Farrokh's family describes him as having a superior intellect. According to his mother and his own recollection, he was an A student during elementary and middle school in Pennsylvania. Following his move to California, he received both private and public education during his initial year. By the time of his father's departure to Virginia, Joseph Farrokh and his mother recalled increasing alcohol and marijuana use, increased truancy and one incident involving a physical altercation with another student at age 17. At the beginning of his senior year in high school, he was expelled for repeated truancy, along with some of his friends. He recalled that he was upset at the vice-principal's decision, and asked his mother to convince the school to retain him. Her efforts were unsuccessful. In her phone interview with me, Ms. Farrokh stressed that Joseph received an official diploma in 2006 despite his expulsion earlier that year and distinguished this achievement as being more significant than just obtaining a GED.

Joseph initially attended Diablo Valley College (DVC) while in High School in 2003 and later in 2007. Following a period of employment, Joseph attended DVC in Pleasant Hill, California. Later at Northern Virginia College he attained a 3.57 GPA his first semester in the fall of 2012, a 2.53 GPA in the spring of 2013 and a withdrawal from his summer 2013 semester. He received A's in Intro to Computing, General Biology I, General Biology II, and Cell Biology. He then successfully completed training for a Certified Nursing Assistant classification from the America School of Nursing and Allied Health in Woodbridge.

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<sup>4</sup> In the 1 July 2016 declaration of Lindsay Page, a friend of Joseph's recalled that there was a time when Joseph would tell others that he was Italian and that his favorite film was The Godfather. At other times, he would speak Spanish and represent himself to be Mexican.

<sup>5</sup> Declaration of 1 July 2016

From the standpoint of employment, his family members and friends have confirmed his own assessment that he has had a positive record in employment dating back to the time that he was a high school student in California.

In his interviews with me, he recalled that he began work at age 17 while in high school as a dishwasher in a pizza restaurant in Benicia, California, where he lived with his mother. He recalled a busy work schedule of approximately 20 hours per week. "Like all of my jobs, people would say I was a hard worker and did a good job. I got a number of raises."

Following this job, and subsequent to his expulsion from high school, he was employed at a golf course as a cook and cart boy. This allowed him to play golf as well, and he reportedly enjoyed the group of friends who also worked at the course. While working at the golf course, he also obtained a job in an Italian restaurant, Angelo's. The owner of the restaurant hired him to work at two other restaurants as well, Palermo's, and Venticello's. In addition, he supplemented his income by driving for Uber during his time in California. He finally quit working at these restaurants in an effort to stop his opiate addiction, stating that some of the other cooks and waiters were also opiate abusers. In addition to attending DVC, he began working as a waiter at Applebee's in an area known for violence and gang activity. Due to discomfort with this environment and his return to drug use, he moved from California to live with his parents in 2012.

While in Virginia, he enrolled in NOVA and also obtained sequential jobs in two shopping mall kiosks for more than two years. In October of 2014 he completed his training as a Certified Nursing Assistant. As a consequence, he quit his kiosk job in January of 2015 in order to work as a nurse's aid at the Virginia Hospital Center in its surgical recovery room. He resigned in late 2015 in preparation for his travel to Syria.

Because of his prior addiction to opiates, I questioned him about his decision to work in a hospital setting, because this would have placed him in proximity to opiates. He said "there were times that I would see Dilaudid [a powerful opioid] within reach, but I never thought about that. I was clean. I don't think that I could steal medicine from a hospital just because I was an addict."

#### RELATIONSHIP HISTORY

Joseph was described by his family members as well as a high school friend, CJ Scott, as being very social. He maintained a core group of 10-15 friends during and after high school and these same friendships traversed school, work and social activities. His friendships with other males were a constant, although he also did have some romantic relationships with women.

Joseph described two heterosexual relationships with females while in California. The first was in high school with another student, when he was 18 years old. He stated that he first became sexually active at age 18, but unlike some of his friends, never engaged in promiscuous behavior. The second relationship with a female was also intimate, and involved living with her and her daughter while at times staying in his mother's town house. This second woman was approximately 10 years older, and she also lived with her daughter from a prior relationship. Joseph's relationship with her lasted for two years and he then lived for several years without any other relationships. He did not report promiscuity during this period, stating that "once I was

using drugs, I wasn't in any sort of relationship. I would have wanted one, but I needed to take care of myself first. I wasn't looking for one at that time, definitely."

When in Virginia, he met his future wife while working at Potomac Mills Shopping Mall. Nine years older than his wife, they married in August of 2015 and are expecting their first child. She visits him regularly at the ADC.

#### SUBSTANCE ABUSE HISTORY

Substance use and abuse of opioids, and his repeated attempts to stop using these drugs without the benefit of rehabilitation programs or therapy played a significant role in Joseph Farrokh's life. His battle with substance dependence, both in California and Virginia, cannot be overemphasized in its importance in understanding the motivations behind many of his behaviors.

Joseph recalled that following his father's move to Virginia, he began using alcohol and marijuana. As time progressed, his schoolwork deteriorated.

I was a good student when I applied myself. My mom was working in medical billing, so when I came home I was alone. I was just left to myself. I didn't have any family structure or support system. I started hanging out with friends, using more alcohol and marijuana. Looking back I wish I had something then to help me. I performed well on tests, but my teachers felt I wasn't applying myself, which was true.

The most concerning aspect of Joseph's drug use was his descent into opiate addiction. His sister suspected this based upon his behavior on the rare occasions that they saw him during his late teens and early twenties. In his interview with me, C.J. Scott recalled that although he always remained loyal to his friends, Joseph would at times seem belligerent when using alcohol. In retrospect, Mr. Scott now feels that this was a sign of a substance abuse problem. In his declaration, C.J. Scott said that he was unsuccessful in getting Joseph to consider drug rehabilitation treatment:

A few years after we graduated from high school I learned that Joseph was abusing prescription drugs, including Oxycontin...His drug use showed in his appearance and the way he acted...It was obvious he was not doing well.

In my interviews with Joseph Farrokh, he spoke with great shame about his drug addiction to opiates, and his many attempts to quit, both in California and later in Virginia. The declaration of Charles Scott echoed the comments of Joseph's sisters regarding identity issues:

When I knew him growing up, he always seemed to have good intentions and wanted to fit in. He treated people well and he worked hard, but I could tell he was lost or searching for something.

In his interviews with me, Joseph spoke about his battles with addiction, and multiple attempts to end his addiction to opiates:

Every night that I would take the drugs, I felt that I wanted to stop. I would just stop using them and not call the people that I knew had them. Multiple times I would detox. Sometimes it was worse

than others. I couldn't sleep, had no appetite. I would have restless legs syndrome when I was withdrawing and that was the unbearable part. I couldn't sleep.

Telat attributed many of his problems to increasing drug abuse. " We thought that he was on drugs. My mother was also concerned, but would say 'I never saw him take a drug' and my brother would never admit it.

In an effort to change his life and stop his addiction to opiates, he decided in 2012 to return to Virginia. As reported to me and as described in the Presentence Report, Joseph was unable to remain free of his addiction to Oxycontin, Vicodin and Percocet.

Joseph Farrokh spoke to me about his earlier use of alcohol and marijuana, which he started using in high school and stopped by the time he was 24 years old, and while still living in California. It was his addiction to opiates that influenced his behavior to the greatest degree, and this addiction began around the age of 22 and continued approximately four years. He first began using prescription opiates while working in a restaurant:

I was working the kitchen. Opiate addiction became a habit. Never heroin, mainly Oxycontin. I was first getting it from a friend, later on I met other people. I would work very hard in the restaurant to make money and then buy drugs...In order to support my habit I would sell to other addicts but not large quantities. And they would do the same with me. This was the height of my drug problem. I was taking four 80 mg pills of Oxycontin per day...I never went to doctors to get it. I never faced an illness It was through contacts.

His sister Sara told me that during the period when he appeared to be using drugs while in Virginia, he engaged in continued arguments with his parents, particularly his mother. The arguments and disrespect stopped following his rejection of drugs and embrace of Islam:

Honestly I think that he had issues with my mother. I feel that a lot of that was between the two of them. Once, he got angry and pushed the couch over, and was upset. My mother called and asked for someone to pick her up. My husband ...went and picked her up. [Joseph never engaged in] violence or threats of violence – he would definitely yell.

Joseph Farrokh has repeatedly stated that he stopped using opiates in late 2013 while in Virginia. "I continued working in the mall. I was starting to pray. I had met my fiancée, and we were thinking of getting married. I was going to go to school to be a nurse or something medical."

According to witness declarations from the time that he worked as a nursing assistant, Mr. Farrokh was responsible and caring, exhibited compassion towards patients and a strong work ethic. He was described to be an important contributing member of the team. During much of that period he expressed interest in advancement within a nursing career, and this was felt to be genuine. His two-week notice prior to his departure was not anticipated by his colleagues at the hospital.

#### MEDICAL HISTORY

Joseph Farrokh is in excellent health, and does not report illnesses or surgeries. He takes no medication.

#### PSYCHIATRIC HISTORY AND TRAUMA

As reported by his mother and father independently in their interviews with me, Joseph received brief counseling from a therapist in Berkeley, California, following his move from Schnecksville, Pennsylvania to Richmond, California. This therapy was brief in nature and did not involve the use of medication. In retrospect, Joseph told me that he might have actually been depressed following his move from Pennsylvania. Although the move from a stable, secure environment in Pennsylvania to a more dangerous and unstable environment in California could be seen as emotionally traumatic, neither he nor his family recalls any major traumas, whether physical or emotional.

#### LEGAL HISTORY

Joseph Farrokh's prior legal history is summarized in the Presentence Report. He had been free of any legal charges for the six years prior to his January 2016 arrest. In March of 2016 he pled guilty to a one-count of Conspiracy to Provide and Attempt to Provide Material Support to a Foreign Terrorist Organization, in violation of Title 18, U.S.C., Sections 2339A(b) and 2339B.

His prior history included convictions for the possession of a switchblade knife for which he pleaded nolo contendere on May 5, 2006. He received a conviction for Driving Under the Influence of Alcohol at age 19 on 20 April 2007. A later charge of driving without registration and on a suspended license was dismissed on 17 August 2009.

#### CLINICAL ASSESSMENT

##### Mental Status Examination and Behavioral Observations

When I met with Joseph Farrokh in an interview room at the Alexandria Detention Center on 17 and 18 June 2016, he was cooperative and pleasant. During four separate visits in those two days, and during a total of eleven hours, he sat across from me at a round metal table.

On exam, he was a tall (6'2"), stocky (215 lbs. by his report) clean-shaven male with short dark hair. Dressed in a green jump suit with white t-shirt underneath, he was not shackled, and wore dark framed glasses and black sneakers. I did not observe any tattoos, and he stated that he has never gotten a tattoo. He expressed interest in losing weight and getting in shape. In order to achieve this, he stated that he does three sets of 25 push-ups and 3 sets of 25 leg-lifts daily. Spontaneous in speech, it was of normal rate, tone and volume. He was fully oriented to all spheres, and was able to recall the names of U.S. presidents from Obama to Nixon, although he did not remember to include President Gerald Ford. He recalled 3/3 objects at five minutes and was able to subtract 7 from 100 throughout and without any errors. He did not report problems with sleep, appetite or weight. (Of note, he is fasting due to Ramadan.) Specifically, he stated to me that

he sleeps in the evenings and nights and had no complaint about his treatment. By his report, he is isolated for approximately 22 hours per day. "I spend the majority of my time reading, exercising or sleeping. The two hours I have out, I talk with my family on the phone, take a shower, work out, and use the microwave. I go to the gym for an hour [three times per week.] He told me that he reads "more than I have read in my life, including Twelve Years as a Slave, Pirate Latitudes and the Bourne Identity.

He reported that his mood is "good" and his affect was mildly limited in range. He did not cry despite at times appearing to be upset when discussing the shame of his opiate use, his plan to travel to Syria for ISIL, and the feeling that he had let down family and co-workers by his decision to travel to Syria and subsequent arrest.

He denied any current or past history of suicidality, and denied any current plan or intent to harm others. Judgment and insight were intact. He was logical and linear, without tangentiality or circumstantiality. The main content of his conversation dealt with the shame of his prior opiate addiction, and his history of disrespect to his parents and particularly his mother, especially between the ages of 15-25. He expressed appreciation for the support of his family and his wife's family, and intense shame and remorse about his evolution from agnosticism to curiosity about his Muslim heritage to practicing Sunni Muslim towards the violence-espousing radicalization that he began to embrace in August of 2015, culminating in his January 2016 arrest at the Richmond Airport.

#### PROCESS OF RADICALIZATION

As previously stated, Joseph Farrokh was reared in a nominally religious household of an Iranian father of the Shia Muslim faith and an American-born mother who had been reared Christian. In their independent interviews with me, his family members spoke about their exposure to Islam in Sunday School while also recognizing some Christian holidays. In his interview with me, his father recalled his son's early exposure to the Muslim faith:

When he was younger, I took him to Islamic Sunday school – I didn't try too hard, because his sister did not have a good experience in Sunday school. That was the only exposure that he had before going to Virginia. I always told him that it is good to have faith.

During his adolescence, he did not acknowledge his father's religious heritage either in his behavior or in his conversations with friends. In fact, in CJ Scott's phone interview with me, he told me that he had assumed that Joseph was a lapsed Italian Catholic from New Jersey, and until contacted by an investigator, was never aware of his father's identity as a practicing Muslim. He reported to me that Joseph almost never spoke about his father, and when asked merely stated that his father lived on the east coast.

Prior to the process of radicalization, Joseph's desperation and shame about his repeated failures to stop his addiction to opiates led to a search for a new value system that would support abstinence from the prescription drugs that he abused.

As noted in the presentence report, and confirmed in Joseph's interview with me, it was in California during a class at DVC the a professor's lecture about religious distinctions led him to learn more about his father's Muslim faith. For the first time since childhood, he began attending a Mosque and befriended native Persians at DVC.

I was born Muslim and that didn't have any effect on my life. The first time I was exposed to Islam was in college in California. I was leaning towards Islam – so even before I stopped the drugs, I started to identify with Islam... I believed in Islam but I wasn't practicing. Part of the reason I moved here from California was that I wanted to get away from that environment...I was able to stop myself, but eventually I would relapse. Sometimes when I would stop, Islam would be reason I would stay off it. I thought, enough is enough. I was productive, working full time, going to school on and off. I felt that I would be more successful in school if I didn't have anything to do with drugs.

Hashem Farrokh recalled his son's attempt to re-connect through their shared faith, and recalled getting a telephone request from his son that he was not able to fulfill:

Then when I moved to Virginia, after 6-7 years, he moved to Virginia. He had not been interested in religion. I remember that he was taking courses in California – he was taking courses in comparative religion. He was writing a paper about a philosopher from Iran, so he called me and asked for help –he lived a thousand years ago so I didn't know much about him.

Joseph Farrokh's embrace of the Muslim faith was slow and halting. Following his move to Virginia, he obtained low-level kiosk jobs at a shopping mall. He began again to abuse opiates, and engaged in familiar conflict with his parents. In her interview with me, his mother recalled this gradual transition in Virginia:

He got a job in the mall. He was hanging around with some guys. He was hanging around with foreign guys from India, Pakistan or the Middle East. I know he would go to hookah bars. Sometimes he would bring empty containers home. He started practicing Islam more. This was a slow kind of process. He started going to the mosques. He did change – we thought that he had changed for the better. He was living with us, and had friction with his father. His father was unhappy that he was not in school.

Dissatisfied with himself, his renewed opiate addiction, and his responsibility for the family conflict, he found that a stronger identity as a Muslim could help him stop and remain free of opiate addiction. In his interview with me, his father Hashem recalled this new phase:

We went to the mosque a few times in Fredericksburg. A few times, I couldn't go. I usually couldn't go that often because of my work. He started going by himself to mosques in Woodbridge and might have gone to Arlington and Alexandria.

In her interview with me, his mother also recalled the change in 2013 when he stopped the use of all drugs, especially opiates:

When he moved out [of our home], that is when he started following the ritual more strictly. I would say that 'you can bring your friends here.' The guy who lived there was Somali. Joseph rented from him and worked in the mall. His bosses were all foreign. That is why it is hard to get

the information. He grew a beard, but didn't change his hair or his look ...He was always clean and neat.

When interviewed, Joseph told me that the eventual cover story of educational opportunities in Saudi Arabia that he represented to his family prior to arranging for travel to Syria to assist ISIL initially began as a real plan:

For a while there was a possibility [of travel to Saudi Arabia for further education]. There was a teacher (in Northern Virginia) from Saudi Arabia. For a while I was [planning on] going to go there to try to study, but it didn't work out. I had put my name in to find out more information, but for whatever reason, the university didn't have any programs left. It was a long-term program, and I didn't want to go for that long. It would have been a few years - I am not sure that I could have gotten into that anyway. The name of the professor was Qusair, and he was in the northern Virginia area. I met him at the mosque. This was in 2015 - the first time I met him was the beginning of 2015, January or February. And then later on, in the summer of 2015, I started meeting with him more often, I attended his classes at the mosque and at his apartment more often.

With him, there was nothing radical at all - I was like a new Muslim. He was teaching basics, like how to pray and how to wash. I had heard him speak against violence - saying that it had nothing to do against Islam.

Joseph's family noticed positive changes with his adoption of the Muslim faith and rejection of all drug use. They recalled that the former drug abuse and conflict was replaced by stricter adherence to orthodox Islam. Although she appreciated his rejection of drugs and greater respect for their parents, in her interview with me, his sister Telat recalled concerning change in her brother:

It was very hard-core with the religion, and it was hard to deal with. Even the way that he was going about it, was not what my dad practiced. He wanted to argue with us, and had something to prove. He would say that he loved us, and with his nieces, he would bring them gifts, but once the religion stuff came up, then it was like, forget it, because he was singularly focused on it. I would think that sometimes it didn't seem like it was for real. Sometimes I thought that he was brainwashed.

Joseph's mother also noted that as time progressed, his physical appearance changed further, and he became more invested in his Muslim faith, and even more dogmatic with his family:

Sometimes he would have the same type of clothing as the Pakistani's, and they would come here. Joseph was always very generous, and sent links to donate money to Syrian mothers and children. Now that I know what I know, in retrospect, I think that I was appeasing him.

Joseph was not happy that his niece was going to a Christian school

In her interview with me, Joseph's sister Sara also commented on the changes in her brother.

He started taking classes and working. Right around this time when he left Fredericksburg, he had expressed interest in religion. He had gone to the mosque. He would come over. I thought, ok, he is finding religion...I know that at one point, he started, almost overnight, getting really into religion,

and would go to the mosque. He would go to the mosque in Dumfries. He lived there with roommates for a while. It just was difficult. He would ask me about my religiosity and what I believed. He became almost pushy, and told us what he thought about it. At that point, it got to be too much. I started avoiding him. I told him how I felt and that I didn't have to answer to him about this.

We found out that he was getting married [to a younger Muslim woman]. I think that for a little bit there, he didn't seem quite so pushy about religion.

I interviewed Joseph's wife, Saba. In my interviews, both Joseph and his family members agreed that his initial meeting and courtship with his future wife preceded his late summer 2015 radicalization towards ISIL and its goals. Their planned wedding in August of 2015 was coincident with his acceptance of violent extremist ideology within Islam and his undisclosed plan to travel to Syria. In her interview with me, his wife recalled their initial interactions while both worked at the mall, and the development of the relationship over time:

I met Joseph at work. We were at the mall. It was [November] 2013, and we would help each other at kiosks. In the beginning, we didn't see each other that much. After a while, our schedules matched...A couple of months after that, we started to meet more regularly. He met my mother in august of 2014.

He is very personable, and has always made me feel comfortable. He is kind, it feels genuine, and not just to impress somebody. My mother felt happy from the beginning. There has never been a male in the family, so this was different for us, but he made us feel comfortable.

We got married in August of 2015. We found out we were pregnant around October/November. We first found out that we were pregnant after he decided to go to Saudi Arabia. In the beginning, it was an idea thrown out. [But later] he told me that after a while, he was settled and wanted to go [to Saudi Arabia].

According to the presentence report, Mr. Farrokh indicated that he participated "in activities and prayer services at the Islamic Badr Community Center of Dumfries, and was pursuing friendships with people of the Islamic faith. He advised this officer that he was seeking to belong to a community and feel a sense of closeness/family. This started him on the path toward his Islamic radicalization."

Joseph Farrokh spoke with me about his own unquestioning acceptance of ISIL propaganda, and the unrealistic promise from ISIL propaganda that he could have his wife and child join him in Syria:

My wife and I never talked about ISIS. She wouldn't have supported me. I had talked about that with Elhassan. There were many propaganda videos about men who brought their wives. A guy from Canada said we have these available accommodations for you. Thinking about it now, it is crazy. I believed it, I was naïve. I thought that I could have a house and my wife could come. It sounds so stupid.

I know that what I did was very deceptive – it was difficult for me to lie to my family like that. I had previously spoken with the teacher from Saudi Arabia, so she knew that was an option. I had mentioned something briefly like this to friends. I said that I heard from the teacher, he got me a spot. I felt horrible

about lying to them. Now I can't even tell you how bad I feel about it. I told my wife that it was six weeks, or maximum two months. She was sad, but we didn't argue about it.

Materials provided to me, including Mr. Farrokh's presentence report, transcripts and his pleading are detailed with regard to his August 2015 acceptance of a radical violent ideology within Islam. They provide factual information that documents a very rapid descent into violent ideology and ultimate commitment to travel to Syria to fight for ISIL. In my interviews with Mr. Farrokh, he stated that he accepted responsibility for his decisions, and spoke of his great shame and remorse for his rapid descent and endorsement of ISIL's terrorist ideology.

In his interview with me, he spoke about the rapidity of his radicalization, which he stated occurred between August and October of 2015:

It took me three months to radicalize – from August to October.

I am reflecting on how I made such poor decisions. I think that [the reason] I was able to be convinced by Elhassan and the propaganda videos was that I needed some sort of meaning in my life, and needed to do something great and to feel successful. I guess to fill that void, previously I had these misgivings and took drugs to fill that void. Now, you know, discussing all of this, I never grew up talking about feelings...

In his interviews with me, he also spoke about the rapidity of his deradicalization:

It took only a few days for me to abandon the radical views. Almost immediately, I knew it was wrong, because I wasn't steeped in radicalization. My heart was not that firmly convinced. When me and Elhassan started thinking about this, we were not expecting that it would be so quick.

Immediately after the arrest, it knocked some sense into me. I realized the importance of my family. Before the arrest and after the arrest, I started to have doubts about whether this was the right thing to do.

He expressed shame and remorse for statements that he had made, and in particular addressed the most violent comment that he made during his conversations with government agents:

I know that I said I was losing patience, but I am not sure that I was just saying this for Elhassan's sake. [Regarding ] the issue about chopping heads, I really cringe when I say that...One time we were discussing something. That was a quote from one of the propaganda videos, and was used in a song. It was something that people said, it was not original to me.

During the eleven hours that I interviewed him, Mr. Farrokh spoke about the responsibility that he bears for his actions:

I am guilty of a crime and I know that there will be consequences for it. I already know that I would not commit the same crime again. What I did do was wrong. I accept that I will be punished for what I did, and have come to terms with it.

He commented to me about his reaction to extremist violence in the United States:

I have a little hand held radio, so I hear the news. What I know is that somebody in Orlando went into an LGBT night club and just started killing a bunch of people, and then he called 911, then the swat team came.

This is like the shooting at the black church , sick. People killing people. I don't want to be anywhere associated with it.

## **DISCUSSION**

Although violence risk assessment has been a significant matter of focused study over the last three decades, the violence and risk assessment of those who have engaged in terrorism is still in its infancy. Although de-radicalization programs have been instituted in countries such as Saudi Arabia and Singapore, they have not yet resulted in any validated tools for terrorist-related violence risk assessment.

In Mr. Farrokh's case, although the process of religious radicalization in support of ISIL occurred only over a matter of months, its antecedents are relevant. In order to understand the potential risk of recidivism for Mr. Farrokh, it is important to understand what attracted him to decide to join ISIL's cause in the matter of just a few months.

Although no validated assessments currently exist for measuring violence risk assessment of terrorists, it is generally understood that ideology is not the only, or even the most important, factor in an individual's decision to join a terrorist group. Initial research suggests that "operatives are often more interested in the expression of a collective identity than they are in the group's stated goals."<sup>6</sup> In the case of Mr. Farrokh, his rapid planning to join ISIL appears to have been mainly influenced through on-line radicalization and exposure to his co-defendant, whose larger network of radical Muslim contacts facilitated Mr. Farrokh's rapid radicalization process.

To reach opinions about Mr. Farrokh's risk status, it is helpful to assess whether an individual demonstrates research-identified risk factors, which are typically static (i.e., fixed and unchanging) factors such as a history of prior violence, history of psychiatric illness, history of substance abuse, certain enduring personality characteristics, etc. Considering well-established risk factors allows assessors to reach reliable and valid opinions about whether a particular person is at higher risk for violence than others. For example, male gender has a greater association with violence, whether terrorism or non-terrorism related. Age is also an important factor. The older that offenders get, the more likely they are to have improved ability to make more calculated decisions. They benefit from the results of prior experiences and arriving at a maturation stage where they can desist from further terrorism.<sup>7</sup> (Shover, 1985)

Below, I summarize research-supported violence risk factors for Mr. Farrokh, and conclude that his risk status is fairly low, as compared to other men his age.

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<sup>6</sup> Jessica Stern, *Terror in the Name of God: Why Religious Militants Kill*, (New York: Ecco/Harper Collins, 2003).

<sup>7</sup> Shover, N, *Aging Criminals*, Beverly Hills, Sage1985

While risk status can be defined as risk for violence relative to other people, it is valuable to estimate a person's risk state, or risk for violence at a particular point in time. Although lacking for those specifically charged with violent terrorism-related offenses, there is substantial scientific literature that can guide an assessment of violence risk status. However, there is much less scientific literature applicable to assessing an individual's risk state. Risk state relates to factors that are dynamic, or changeable. Nevertheless, there are some dynamic, or changeable, risk factors that appear to be associated with risk state. In Mr. Farrokh's case, these may include active substance abuse, and receptivity to supervision. Below, Mr. Farrokh's current clinical state is reviewed, demonstrating that his current context, and conclude that his risk state is relatively low, as compared to other periods in his life.

Lastly, because the goal of most violence risk assessment is violence prevention rather than prediction, risk management strategies are important to consider. Below, we offer some risk management strategies are offered for those factors that may be associated with violence risk in Mr. Farrokh's case.

**RISK STATUS:**

Research has identified several risk factors that tend to be associated with a higher risk for violence. These factors are felt to act in an additive fashion: Individuals who demonstrate more risk factors tend to be at higher risk for violence than individuals who demonstrate fewer risk factors. In Mr. Farrokh's case, he demonstrates only a few of the primary risk factors for violence. These tend to be static (unchanging) risk factors based on his past behavior.

**History of Previous Violence**

Research suggests that past violence is the risk factor most strongly associated with future violence. All accounts suggest that Mr. Farrokh has a negligible history of prior violence. By his report and that of his mother, he was engaged in one fight with another student in high school following a verbal altercation. This physical altercation was initiated by the other student who reportedly threw clay at Mr. Farrokh's head and that escalated to a verbal then physical altercation. He was ultimately expelled from school later at the age of 18, but this was due not to the physical altercation with the student but rather due to repeated truancy. His sister reported that he was said to have thrown a candle against a wall when living with his mother in California, and also was noted to have turned over a couch during an argument with his mother. He and his family agree that there was no domestic violence experienced in the home while growing up. His wife denied any history or hint of domestic violence during the two years that they knew each other including the half-year that they were living together as a married couple. Although his friend from California, Mr. Scott recalled that he could appear to be belligerent when intoxicated, this did not seem to be particularly unusual when compared to his peers and did not result in loss of friendships. Mr. Farrokh, his family and his friends report that he was always able to maintain employment and could not recall any time that Mr. Farrokh was fired from a job for any reason. They present a picture of someone who could effectively work with others in a collaborative way, and whose interpersonal skills were such that they could defuse particularly volatile situations. It is notable that despite Mr. Farrokh's repeated truancy, social comfort with others and abuse of alcohol and marijuana while in high school and later his abuse of opiates, he was never a part of a

gang and never defined himself as an outcast. While terrorist groups are distinct and much less common than youth gangs, there are some similarities that are translatable.<sup>8</sup>(While his own community of Benicia was lower in crime than surrounding areas, the surrounding communities did contend with significantly higher crime and gang activity. There was no indication that Mr. Farrokh engaged in any group criminal activity, gang or otherwise, in spite of his self-professed claim to be from New Jersey, and strong identification with the New Jersey mafia, as represented in popular films of the time.)

Therefore, considering all the available data, it appears that Mr. Farrokh does not have a significant history of violent behavior towards others during his adolescent years or at any time.

### **History of Substance Abuse**

Mr. Farrokh reported a substantial history of substance abuse. As detailed above, he explained that during mid-adolescence, he gradually escalated from alcohol to marijuana during high school to prescription opioids after receiving his diploma. He pointedly denied any IV use of heroin or other substances of abuse, and there is no evidence in the record that contradicts this.

Since accepting his Muslim faith in 2013, he characterized himself as being completely free from illicit drugs at present. Although in general, a history of substance abuse problems tends to be associated with violence risk, it appears that Mr. Farrokh was not violent during the period that he was addicted to opiates. Rather, it was not until he rejected all drugs that he adopted a strict religious value system that later evolved into his acceptance and support of the violent ideology of ISIL.

Considering other research-identified risk factors, there are some that Mr. Farrokh also does not manifest or manifests only slightly:

### **History of Psychiatric Illness**

Research suggests a modest relationship between psychiatric illness history and violence. It is therefore relevant to note that neither Mr. Farrokh nor any of his family members report any history of mental illness. Although his parents were both understandably concerned that he might have been reactively depressed following his move from Pennsylvania to California, the brief assessment by a therapist in Berkeley is reported to have not yielded a diagnosis or treatment recommendation for any mental illness.

### **Early Maladjustment:**

A history of severe developmental or behavioral problems in childhood tends to be associated with violence risk in adulthood. However, there is no evidence to suggest that Mr. Farrokh has a history of any behavioral problems prior to mid-adolescence. Sources were also consistent in reporting that Mr. Farrokh did not experience any early childhood abuse or instability.

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<sup>8</sup> 36 For a summary of this research see Braga, Piehl, and Hureau, "Controlling Violent Offenders Released to the Community," p. 414.

### **Relationship Instability**

Research suggests that unstable or volatile relationships are, not surprisingly, associated with violence risk. Although he has reported that he was often disrespectful to his parents, particularly his mother, there is otherwise no evidence for instability in Mr. Farrokh's relationships. Furthermore, he and his sisters do not report any history of domestic abuse between his parents. Regarding romantic relationships, Mr. Farrokh described spending two years in a relationship that was noted to be stable and without any significant conflict. In my interview with his wife Saba, she completely denies any history of instability/volatility in their relationship. Although his decision to leave his pregnant wife to travel to Syria to join ISIL is unusual, there was no correlating domestic violence involved, either physical or emotional. Thus, relationship instability as a risk factor for Mr. Farrokh is absent. The fact that Mr. Farrokh chose to leave a stable relationship with his pregnant wife to travel to Syria is a cause for concern, just the same. He emphasized in his interview to me that although he at times projected a confident and determined exterior when speaking with the agents, he had significant misgivings and voiced them to his co-defendant around the time of his departure.

### **Personality Disorder**

Formal diagnosis of a personality disorder is often considered a risk factor for violence. Mr. Farrokh has never been diagnosed with any mental illness. Although during high school and in his early twenties he demonstrated some antisocial behaviors, he is not known to have met full diagnostic criteria for any formal personality disorder. Thus, personality disorder diagnosis is not a risk factor that he manifests to a substantial degree.

### **Employment or Educational Instability**

Instability in employment or education tends to be associated with violence risk. Contrary to that, he has consistently held jobs since his teenage years. Mr. Farrokh and others have characterized his performance in these jobs as quite good. According to my interviews with him, all family members and a friend in California, in addition to witness declarations from his last position as a nursing assistant, he has excelled in the work environment, even when addicted to opioids. His opioid addiction has been more challenging to his academic career. Mr. Farrokh has had some instability in his college career at Diablo Valley College and at Northern Virginia Community College. This appears to correlate directly with his opiate addiction, as demonstrated by his success in 2014 when attaining his certificate as a nursing assistant. Thus, education/employment instability is a risk factor that Mr. Farrokh manifests to only a slight degree.

### **Psychopathy**

Although no testing was conducted in order to validate, available collateral evidence does not suggest that psychopathy is a risk factor that Mr. Farrokh manifests to a substantial degree. According to his family, friends and co-workers, he has been noted to demonstrate empathy for others and to demonstrate loyalty. He has demonstrated an ability to be independent, which is contrary to the parasitic lifestyle displayed by individuals who are psychopathic. He consistently demonstrated a strong work ethic and could be relied to assist others in the surgical recovery

room, based upon witness declarations from his most recent job in the hospital. His acceptance of responsibility and statements about his current shame and remorse as well as his increased candor about his opiate abuse are not consistent with the statements and behavior of someone who demonstrates psychopathic traits. His presentence report stated: "looking back, he is appalled by his misguidedness. He insisted that he has no interest in harming the United States government or its people and does not support violence as a means to any end."

His ability to deceive others about his substance abuse and later about his plans to travel to Syria appear to reflect a long history of maintaining secrets within the family, and may have their origins in his substance abuse of alcohol, marijuana, and opiates in particular. For him, His family had expressed concern about his growing strict adherence to a very conservative interpretation of Islam, and his secrecy and deceit were instrumental in making his plans to travel to Syria to join ISIL. Mr. Farrokh's adoption of the identity of a New Jersey Italian after his classmates named him Jersey Joe appears to have been driven by his longstanding insecurity and need for acceptance rather than a decision to assume another identity for secondary gain, a feature seen in psychopathy. Similarly, his identification as a Mexican and decision to learn Spanish also appears to have been driven by insecurity and need for uncritical acceptance into a group.

### **Prior Supervision Failure**

Research suggests that failing to follow formal supervision conditions (such as probation or mandated mental health supervision) is associated with increased risk for violent behavior. Mr. Farrokh did have some non-violent offenses as a younger man and failed to appear in court in 2008 or to pay a fine for a probation violation, thus requiring a bench warrant to be issued followed by his arrest. Other than his failure to appear or pay a fine on that occasion, there is no recent evidence to suggest that he has failed to maintain any conditions of supervision. Thus, prior supervision failure is a slight risk factor that Mr. Farrokh manifests.

### **Risk Factor Summary**

Reviewing the research-supported risk factors for violence suggests that there are very few key historical factors that place Mr. Farrokh at increased risk for violence, relative to other men his age. The most concerning factor is his history of substance abuse, although it was only after he had fully stopped his substance abuse for almost two years before he acknowledges that he became radicalized. In spite of this, an examination of the static factors indicates that he is at low risk for violent recidivism. These important factors include his virtual absence of prior violence and absence of psychiatric illness. It is also important to emphasize that there are many other risk factors he does not manifest to a substantial degree (e.g., psychopathic personality, formal personality disorder, prior supervision failure, relationship instability/volatility).

### **Risk State**

The risk factors considered above are important, because they are empirically associated with future violence. It is also important to emphasize that they are static, or unlikely to change, in that they are historical or at least longstanding. Thus, they provide important information about an

individual's risk status (i.e., overall risk of violence as compared to others), but little information about an individual's risk state (i.e., risk for violence at a given point in time).

Below, factors most relevant to risk state are considered. That is, Mr. Farrokh's risk for violence in the near future.

**Current Substance Use:**

In general, current substance abuse tends to be the risk factor most strongly associated with violence risk state. In the case of Mr. Farrokh, it was only *after* he completed his current substance use patterns that he ultimately decided to join ISIL. He emphasized that he currently abstains entirely from any illicit drugs, and I could identify no information to contradict this report. Certainly, any current substance abuse would be nearly impossible given his extremely secure jail setting within the ADC.

**Current Psychiatric Symptoms**

Active symptoms of psychosis, particularly when combined with substance abuse, are associated with increased violence risk in the short term. However, we could find no evidence to suggest that Mr. Farrokh has ever manifested symptoms of psychosis, or any symptoms of major mental illness for that matter. Thus, a review of Mr. Farrokh's absence of mental health history indicates a lower risk state for violence.

**Treatment Alliance and Treatment Adherence**

Mr. Farrokh has never engaged in substance abuse treatment, except for a mandatory training that he was required to undergo following his conviction for DUI approximately ten years ago. His friend, Mr. Scott did reportedly recommend substance abuse treatment for Mr. Farrokh when he lived in California, but Mr. Farrokh is said to have replied that he could quit on his own.

Ultimately, Mr. Farrokh was able to stop all drugs of abuse by subscribing to the values of traditional Islam. While this behavioral accomplishment was certainly quite significant, it eventually came at a high cost because it ultimately led to more serious problems, i.e. the rapid adoption of the radical violent extremist ideology of ISIL.

Thus, to the extent that Mr. Farrokh engages in and remains cooperative with his substance abuse treatment providers, this treatment engagement would be a protective factor against a re-adoption of not only a value system that eschews drug abuse, but a radical violent extremist philosophy. In my interview with him, he repeatedly stated his willingness and strong interest in engaging in a substance abuse treatment program while in prison and afterward. Although he has not reportedly used or abused any drugs (including alcohol, marijuana, opiates) since 2013, he realizes that without such treatment he is at risk of returning to substance abuse and dependence.

### **Current Personal Support**

Not surprisingly, isolation and conflictual relationships tend to increase risk for violence while supportive relationships tend to serve as a protective factor against violence. He described his current relationships as uniformly supportive. All information we reviewed also suggested Mr. Farrokh has current social support. Collateral interviews with his parents and sisters suggested that they are motivated to support him during his prison sentence and afterwards. His pregnant wife and her mother have been very supportive of him, and he speaks positively about the pending birth of his child. Thus, Mr. Farrokh's current social support tends to suggest a lower risk state, particularly as compared to other periods within the past few years when he was more isolated and addicted to opiates or rapidly radicalizing.

### **Violence-conducive Attitudes:**

Practice guidelines for violence risk assessment encourage clinicians to examine whether an individual demonstrates "violence-conducive attitudes" or "negative attitudes", broad terms that encompass many types of attitudes or beliefs that might support violence (e.g., membership in a radical or antisocial group, attitudes supportive of crime, misogynistic attitudes towards women, etc.). Aside from his rapid radicalization in pledging his allegiance to ISIL, purchasing a plane ticket and arriving at the departure gate, I could identify no information to suggest that Mr. Farrokh has a history of maintaining violence conducive and negative attitudes. Based upon his plea agreement and renouncement of his involvement, he does not report violence-conducive attitudes or ideology. Such attitudes may have been present in the past, when Mr. Farrokh was involved in the illicit drug culture as an adolescent and young adult. However, he tended to speak disparagingly of his time in the illicit drug subculture, and I could elicit no information to suggest that he currently endorses pro-criminal attitudes.

### **Weapons Access:**

I found no evidence that Mr. Farrokh has ever owned or fired a weapon. Access to weapons of course makes violence to self or others, particularly impulsive violence, more feasible. From the standpoint of terroristic behaviors, he has not engaged in any weapons training, and if he had proceeded to Syria in support of ISIL, would have been among the most inexperienced with weapons and tactics. His statement that he did not know that the switchblade that was in his possession as a teenager was in fact illegal is credible, based upon the context of its confiscation and the absence of any other weapon possession or use in subsequent years.

### **Specific Threats**

Obviously, specific threats of violence should be considered in any risk assessment, and violent incidents are sometimes preceded by "threat leakage" or mention of specific interest in harming others. I could elicit no information from Mr. Farrokh or collateral sources suggesting that he has made specific threats of harm to any specific person. Of course, it is impossible to rule out the remote possibility that Mr. Farrokh continues to entertain violent ideology that he has not shared. But he has long demonstrated that he is quite environmentally dependent on those around him and with whom he spends the most time. Despite his potential to access on-line media exposure espousing violent extremism over more than a decade, the amount of time that he appeared to

embrace violent ideology occurred only over a period of months. To the extent that he continues to maintain close phone and visitation contact with his family and is not surrounded by those who espouse violent ideology, it is likely that he will further abandon radical and violent ideology. There is no evidence to suggest that he has shared specific threats.

### **Summary regarding Violence Risk**

As detailed above, there is only one factor in Mr. Farrokh's history that is empirically proven to be associated with violence risk, and hence, slightly elevates his risk for violence, relative to men in their twenties. Because a history of substance abuse is a historical factor that cannot change with intervention, Mr. Farrokh's violence risk status will always be somewhat elevated, relative to others with *no* risk factors whatsoever, particularly if he were to return to contexts that offer access to illegal drugs.

However, when considering Mr. Farrokh's current risk state, most of the risk factors bode for somewhat lower risk at present. In other words, most of the data tends to lower, rather than raise, concerns about Mr. Farrokh's potential for recidivistic violence in the near future. Lacking good empirical data on terrorist risk factors, most of the data suggests that in severing his association with his co-defendant, Mr. Farrokh is at lower risk for re-adoption of violent extremist plans than he has been in past periods as well as violence and other problematic behaviors.

### **Risk Management**

Because the goal of most violence risk assessment involves violence prevention (rather than violence prediction), risk management strategies are addressed below. These risk management strategies correspond with the dynamic risk factors (i.e., those subject to change) reviewed above.

**Regarding Substance Abuse:** Substance abuse monitoring and treatment is a common component of risk management plans, and is particularly important in Mr. Farrokh's case because all of his known serious history of marijuana, alcohol and opiate addiction.

**Regarding Psychiatric Symptoms:** Sources are consistent in suggesting that Mr. Farrokh does not suffer from any mental illness. There is no prior or current evidence that would necessitate medication. However, based upon his prior history, in addition to substance abuse treatment, he will likely benefit from counseling in order to address the longstanding insecurity with maintaining a stable identity.

**Regarding Treatment Alliance and Treatment Adherence:** Mr. Farrokh, like most people, will be more motivated to continue treatment if he perceives a strong alliance with those who provide drug rehabilitation and counseling, and believes that they are pursuing his best interests.

**Regarding Social Support:** Mr. Farrokh appears to have a more constructive relationship with his parents, with regular visits that include his expectant wife. These factors bode well for his social support. Although there is probably not much that a risk management plan can do to orchestrate new social support (beyond formal treatment services), there are a few considerations relevant to current social support. First, it would be important to avoid risk management strategies that substantially increase Mr. Farrokh's social isolation. Second, it may be helpful to have his parents

involved in at least some of the risk management strategies. Parental involvement raises some difficult questions about confidentiality. But, given his parent's current motivation, and their increasingly positive relationship with Mr. Farrokh, it would be ideal to have their support in at least some aspects of the risk management plan.

### **Factors Relevant to Terrorist Violence and Risk of Re-Radicalization**

While the above listed factors have been well researched, and are useful within U.S. populations for assessing the risk of violent recidivism, neither these factors or any factors have yet been empirically validated as being specifically relevant to the risk for a return to terrorism. They may however serve as anchors for understanding Mr. Farrokh's overall risk for violence, but because the study of factors relating to terrorism is in a nascent stage, their relative importance should not be overestimated.

Researchers in the area of terrorism risk have developed hypotheses relating to likelihood of terrorist recidivism. In the literature review conducted by Horgan and Altier<sup>9</sup>, there are ten factors that are associated with recidivism towards terrorism.

#### **1. A strong emotional attachment to the terrorist organization or ideology**

There is no evidence that Mr. Farrokh currently adheres to the precepts of ISIL or any other organization that espouses terrorism-related violence. But, it is clear that Mr. Farrokh at one time demonstrated a rapidly developed emotional attachment to the cause of Muslim victims in Syria and the importance of traveling to Syria to serve with ISIL. Radicalized through the videos of Anwar al-Awlaki and ISIL propaganda, he was so attached that he decided to leave his job and pregnant wife and family behind. Like other identities that he has embraced, such as an Italian from New Jersey and Mexican from California, he has also abandoned the ISIL identity that he adopted in August of 2015. Just as in the other identities described by friends and family, these influenced his behavior and appear to have been associated with a tribal need to belong to a group composed of young men and to be accepted by others. In both of these prior identities, the notion of family and loyalty was very important to him. Distinct from these previous other identities that he wore, this new identity as a pledged member of ISIL kept him "clean" and free of a return to opiate addiction. Although there was less prioritization of family in this new identity, his affinity for the strict discipline of ISIL may have served to rescue him from a return to his dissolute and despairing lifestyle as an opiate addict.

#### **2. A sense of duty or moral obligation to participate in the terrorist organization or cause.**

The brief period from August 2015 until the time of his arrest in January of 2016 was imbued with a sense of moral obligation to travel to Syria in order to join with like-minded individuals in order to fight for Muslim victims of violence. Mr. Farrokh told me: "Their videos tried to make it seem like a utopia there, it is such a joke – like you would go there and have some great life. And slowly I started to believe it." Subsequent to his arrest, in my interviews with Mr. Farrokh, he

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<sup>9</sup> Horgan, J, Altier, M, Pathways, Processes and Roles for Terrorist Disengagement, Re-engagement and Recidivism, International Center for the Study of Terrorism.

emphasized not only his shame and embarrassment for preparing to join ISIL in Syria, but also his moral obligation to his new wife, soon-to-be-born child and his former co-workers at the hospital. His nightly phone calls with his family and regular visits are an indication of the current attachment that he feels with his family. His decision to plead and assist the government may reflect a new moral obligation and loyalty to both his family and his country.

**3. Positive relationships with others in the terrorist organization.**

Aside from his co-defendant Elhassan, Mr. Farrokh had no strong positive relationship that he held during his radicalization period with ISIL. Notably, his co-defendant appears never to have met Mr. Farrokh's wife and Farrokh never told him about his prior serious addiction to opiates. Although a strong emotional bond appears to have been present, this relationship did not overlap with other important relationships, such as co-workers at the hospital, some of whom attended his August 2015 wedding. The friendship with his co-defendant began prior to August of 2015 when he was radicalized. The character and quality of this loyal relationship seemed similar to the high school and young adult friendship in California that was described by Mr. Scott. In his interview with me, Mr. Farrokh described the relationship with Elhassan in the following way:

In the five or six months before arrest, Elhassan would see me often. He was definitely someone who I felt I could trust – to hang out, go get some food. We would be in each other's company. I guess it was nice. I never had a brother growing up. I always had close male friends, and always had a bond. I felt a mutual brotherhood with Elhassan. He was one of the few people who knew that my wife was pregnant, but I don't think that he ever met her.

**4. Satisfaction with day-to-day tasks.**

This does not appear to have been a relevant factor for Mr. Farrokh. The period of Mr. Farrokh's radicalization was so short, that this factor does not apply. Mr. Farrokh's brief period of radicalization with ISIL was marked by frustration and impatience in his attempts to secure a plan to join ISIL in Syria, rather than satisfaction with the day-to-day tasks of a terrorist organization. Instead of day-to-day tasks, regular personal interaction with his co-defendant does appear to have been meaningful for him. This was similar to the mutual brotherhood and loyal bonds that he had shared with other male friends, as attested by one of his close friends from California, C.J. Scott. Conversely, Mr. Farrokh demonstrated a history of disciplined day-to-day work in legitimate jobs that he held in society. His punctuality and conscientiousness were evident even during the time when he was strongly addicted to opiates.

**5. A sense of belonging or social support as a member of the terrorist organization.**

The first part of this factor is very true for Mr. Farrokh, although the type of organization (terrorist) did not appear to be a driving concern. It is clear that a sense of belonging and social support was important for Mr. Farrokh, particularly after he stopped the use of opiates. As far back as high school and as a young adult, the identities that he adopted and later discarded (New Jersey Italian supporter of mafia principles, Spanish speaking Mexican) were extremely important to him. All whom I interviewed stressed the importance that he placed in creating a family in California in the absence of his own. Influenced by their utopian propaganda, the promise of a

brotherhood of ISIL within Syria held great attraction for him. Unlike other identities that he had adopted, ISIL carried with it the likelihood of keeping him opiate free, something that was extremely important to him. He does not appear to be someone who primarily desires to join an outlaw group for its own sake. If that were the case, he would have had an opportunity to join gangs when he was growing up in California, as there was significant gang activity in areas adjacent to his small town of Benicia.

**6. The “sunk costs” of joining a terrorist organization and participating in terrorism.**

This would not constitute a major reason for Mr. Farrokh to return to terrorism. When considering the “sunk costs” issue, it is important to consider both money and time. He had invested substantially more time to courting and marrying his wife, and increasing his education by enrolling in a nursing program and doing well, both in class and while working. His emphasis on being a practicing Muslim who was more adherent than his father was also an investment of time and energy. Compared to these, the short time that he spent as a follower of ISIL did not take him so far down the road that his professed decision to turn back poses an overwhelming career and identity change. That said, the rapid commitment to buy the plane ticket, quit his job, and lie to his family about his plans was not insubstantial, and represent a significant cost, albeit not a longstanding and irretrievable “sunk cost.”

**7. Possible sanctions by the terrorist organization.**

In view of his decision to plead guilty and to assist the government, this may not be applicable as he is currently awaiting sentencing. This is not to minimize the potential for him or his family to suffer at the hands of ISIL or a similar terrorist organization.

**8. Limited economic, educational, or social opportunities in mainstream society.**

In light of his recent advancement of his education, securing of a better paying job as a nursing assistant, his continued abstinence from drugs of abuse, his marriage and pending fatherhood and his rapprochement with his family, his social, educational and economic position had reached its peak in 2015. Much of those opportunities and supports remain. His daily calls with his family, regular visits by wife, mother and father, and interest in being a father to his child demonstrate that he will have opportunities in society. Upon his eventual release, he possesses the intellect and social skills to function productively in legal, gainful employment in the setting of a supportive wife and family.

**9. Fear of detection or prosecution in mainstream society.**

Because of his arrest, pleading and upcoming sentencing, this factor also is not a relevant concern. He feels that his actions have brought shame upon him and his family, and that the process has revealed his most closely held secrets, including his prior opiate addiction.

**10. Strong familial or communal support for the terrorist organization or cause.**

I have seen no evidence whatsoever that this is accurate for Mr. Farrokh. Contrary to the situation faced by those who are encouraged by family and community to join a terrorist organization, Mr. Farrokh had no family or known communal support for ISIL or its goals. He and his co-defendant were quite secretive and did not consult within their local mosque or other Islamic organizations for assistance.

Furthermore, neither he nor his family can identify an existing grievance that would fuel even passive support of ISIL or any other terrorist group. According to his friend, Mr. Scott, the California community where Mr. Farrokh grew up was especially patriotic. Some of those members of his core group of 10-15 high school friends enlisted and served in the military. In my interview with Mr. Farrokh, he proudly told me that his maternal grandfather served in the military with distinction during WWII.

**Summary**

Based upon the information gained from a review of government materials, collateral records and interviews with Mr. Farrokh, his family members and others, I have reached my conclusions to the four questions with a reasonable degree of certainty. Should additional information be provided that is at variance with the material that I have reviewed, my opinions and conclusions are subject to additional review and may require modification.

1. Based upon validated measures in violence risk assessment as well as early terrorism-related research in recidivism, the prospect of Mr. Farrokh's recidivism in areas of terrorism-related activity are significantly decreased relative to others who might receive and plead guilty to the same charge, and his risk of recidivism for terrorism-related crimes is low. This conclusion is based on Mr. Farrokh's unique offender characteristics, nature of his involvement in this crime, and his accepting responsibility and substantial assistance to the United States.
2. Reliable information provided in court documents and in collateral interviews indicates that Mr. Farrokh's criminal history category substantially over represents the *likelihood* that he will commit other crimes in the future. Compared to other individuals in their twenties, Mr. Farrokh's risk state and risk status are significantly decreased, and his risk of recidivism is low.
3. Reliable information provided in court documents, collateral interviews, and other collateral sources indicate that Mr. Farrokh's criminal history category significantly over represents the seriousness of his prior criminal history. Mr. Farrokh's relative youth, the relationship of these prior crimes to substance abuse and the absence of threat of violence/weapons, and the number of intervening years without arrest prior to his most recent offenses all serve as mitigators. In addition, the prior offenses constitute minor crimes for which Mr. Farrokh received no sentence of incarceration, and have no relationship to the current offense.

*Re: United States v. Joseph Hassan Farrokh*

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4. In both the nature and circumstances of the offense, as well as the history and character of the defendant in mitigation, an abundance of evidence is available related to Mr. Farrokh's background, character, record, and acceptance of responsibility that clearly suggest a downward departure from existing guidelines in his sentence would be appropriate.'



Gregory Saathoff MD 7 July 2016

# **EXHIBIT C**

# **Sahair Monfared, Psy.D.**

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## ***Education:***

<b>08/04 – 12/08</b>	<b>American School of Professional Psychology at Argosy University/ Washington DC, Arlington, VA</b> Doctoral: Clinical Psychology (Psy.D.)
<b>08/04 – 04/07</b>	<b>American School of Professional Psychology at Argosy University/ Washington DC, Arlington, VA</b> Master of Arts: Clinical Psychology
<b>08/01 – 05/03</b>	<b>Marymount University, Arlington, VA</b> Master of Arts: Counseling Psychology
<b>08/96 – 05/00</b>	<b>University of Virginia, Charlottesville, VA</b> Bachelor of Arts: Biology                            Minor: Asian Studies

## ***Licensures:***

- Licensed Clinical Psychologist in Virginia (#0810004621), Maryland (#05304), District of Columbia (#PSY1000829)

## ***Experience:***

### **Woodbridge Psychological Associates, P.C., Woodbridge, VA**

10/08 – present  
Clinical Psychologist

- Conduct individual counseling with adolescents and adults
- Conduct couple and family therapy
- Conduct psychological testing with adolescents and adults
- Conduct forensic mental health evaluations that include competency to stand trial for adults and juveniles, mental state at the time of offense, and sex offender risk assessment evaluations
- Provide crisis intervention and provide clinical consultation

### **Life Enhancement Services, Washington, DC**

07/13 – 05/14  
Clinical Director

- Recruit, evaluate, and work with the Medical Director to approve all potential employees
- Works with the Medical Director to oversee peer review of providers
- Establish and enforce clinical policies and procedures
- Establish and update clinical practice guidelines for providers
- Responsible for medical performance of clinical staff
- Ensures that the agency complies with medical standards, regulations, and laws created by regulators, accrediting organizations, and state or federal government agencies

# **Sahair Monfared, Psy.D.**

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- Implement and oversee Quality Assurance/Quality Improvement program and chair the QA/QI committee
- Work to help implement the transition to electronic health records
- Liaison between Executive Director, Clinical manager, psychiatrist, and staff
- Communicate with local health authorities such as the Department of Behavioral Health
- Report at monthly Executive Committee meetings of the Board of Directors
- Assist in coordination of care to make certain that evaluations and treatments proceed expeditiously
- Seek sources of specialty care for individual patients as needed by personal intervention with specialty providers

## **Comprehensive Community Health Psychological Services, Washington, DC**

01/08 – 01/15

Group Facilitator

- Performed comprehensive mental health assessment
- Facilitate outpatient groups for dual diagnosed clients
- Assessed risk factors of suicidal clients
- Conducted comprehensive substance abuse assessment

## **Unity Health Care, Washington, DC**

09/07 – 07/13

Mental Health Clinician

- Perform comprehensive mental health assessment at the District of Columbia jail
- Provide mental health intake and emergency services for defendants
- Assess risk factors of suicidal clients and complete treatment and discharge planning for clients
- Provide individual and group therapy
- Provide mental health signs and symptoms training to correctional officers at the Department of Corrections
- Maintain collateral contact with the community (i.e. District of Columbia Court systems, Court Services & Offender Supervision Agency, Pretrial Services Agency, Addiction Prevention & Recovery Administration, Core Service Agencies)
- Work in a multidisciplinary team that includes but is not limited to psychiatrist, psychologist, nurses, licensed social workers and licensed professional counselors
- Provide clinical supervision to other licensed professional counselors

## **District of Columbia Pretrial Services Agency, Washington, DC**

09/03 – 07/07

Case Manager/ Pretrial Services Officer

- Performed comprehensive mental health assessment
- Connected consumers with outpatient mental health services
- Conducted psychological testing
- Assessed risk factors of suicidal clients
- Conducted comprehensive substance abuse assessment
- Provided individual counseling to dually diagnosed clients

# **Sahair Monfared, Psy.D.**

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4320 Prince William Parkway Suite 109 Woodbridge VA 22192 (W) 680-4200 ext. 103 sahair.monfared@wpapc.com

- Represented the Agency and clients in court-related matters

## ***Supervised Experience:***

### **Rappahannock Area Community Services Board, Fredericksburg, VA**

07/07-07/08

Pre-doctoral Clinical Psychology Internship

- Provided mental health outpatient services to culturally and socioeconomically diverse children, adolescents, and adults
- Provided individual, family, and couples therapy and facilitated anger management and substance abuse groups
- Provided competency restoration classes to adjudicated incompetent defendants
- Provided diagnostic assessments and comprehensive treatment plans to individuals seeking treatment for behavioral health, substance use disorders, and mental health crises
- Conducted psychological, mental retardation, competency to stand trial, mental state at time of offense and custody evaluations and wrote accompanying reports with recommendations used by local, state, and legal entities
- Worked closely with psychiatrists, social workers, case managers, hospitals, and legal entities as well a private and nonprofit agencies to ensure comprehensive mental health outpatient services and resources are provided to clients

### **Psychiatric Institute of Washington, Washington, DC**

08/06-06/07

Doctoral Externship

- Conducted psychological assessments with diverse population of children, adolescents, and adults
- Participate in treatment planning with the multidisciplinary team for the patients assessed
- Participate in weekly testing seminar

### **Minnie Howard School, Alexandria, VA**

09/05-06/06

Doctoral Externship

- Conducted individual counseling sessions with adolescents
- Conducted individual and group counseling sessions with ADHD clients
- Conducted psychological evaluations to determine eligibility for special education services

### **District of Columbia Pretrial Services Agency, Washington, DC**

08/02-08/03

Masters Internship

- Completed comprehensive substance abuse assessment
- Conducted individual and group counseling sessions with adults
- Conducted program orientations for new admissions
- Maintained regular contact with assigned defendants

# **Sahair Monfared, Psy.D.**

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4320 Prince William Parkway Suite 109 Woodbridge VA 22192 (W) 680-4200 ext. 103 sahair.monfared@wpapc.com  
**PRS Engleside, Alexandria, VA**

01/01-06/01

Masters Externship

- Facilitated an adult women's support group for dually diagnosed clients
- Provided one-on-one counseling to chronically mental ill clients
- Supervised the operations of different units throughout the center

## ***Research:***

### **Doctoral Dissertation**

*Outpatient Competency Restoration Program for the District of Columbia*

American School of Professional Psychology, Arlington, VA

01/06-08/08

Chair: Dr. Stephen Lally

- Data collection, data processing, and data analysis on the District of Columbia Outpatient Competency Restoration Program
- Retrieval of literature review on competency restoration programs across the nation
- Presented findings of study to faculty and students
- Created a curriculum for the District of Columbia Outpatient Competency Restoration Program

### **George Mason University, Fairfax, VA**

06/00-09/00

Research Assistant at the Human Emotions Research (HERL) Lab

- Data collection, data processing, and data analysis
- Retrieval of literature review

### **Department of Ophthalmology at UVa Health Science Center, Charlottesville, VA**

08/98-5/00

Lab Technician/Research Assistant

- Collected and analyzed information on Sebaceous Carcinoma
- Presented findings of study to faculty and students
- Administered lab tests on cancerous tissue samples

## ***Professional Memberships:***

- Member of American Psychological Association
- Member of the Virginia Psychological Association
- Member of the District of Columbia Psychological Association

# **EXHIBIT D**

**WOODBRIDGE PSYCHOLOGICAL ASSOCIATES, P.C.**

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Woodbridge, Virginia 22192

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**REPORT OF FORENSIC  
MENTAL HEALTH EVALUATION**

**DEFENDANT NAME:** Joseph Farrokh  
**CASE NUMBER:** 1:16-cr-20-AJT  
**DATES OF EXAMINATION:** April 22, 2016; June 21, 2016  
**DATE OF REPORT:** July 6, 2016  
**EXAMINER:** Sahair Monfared, Psy.D.

**REFERRAL**

Pursuant to your request, I have completed a psychological evaluation of your client, Mr. Joseph Farrokh. It is my understanding that you requested this evaluation in anticipation of Mr. Farrokh's upcoming sentencing before The Honorable Judge Anthony J. Trenga, in the United States District Court for the Eastern District of Virginia.

**SOURCES OF INFORMATION**

1. Clinical Interview with Joseph Farrokh at the Alexandria Department of Corrections (DOC) on April 22, 2016 and June 21, 2016;
2. Presentencing Investigation Report dated July 4, 2016;
3. Interview and emails with defense counsel, multiple dates;
4. Interview with Donna Farrokh, Mr. Farrokh's mother, on April 21, 2016;
5. Interview with Hashem Farrokh, Mr. Farrokh's father, on April 27, 2016;
6. Interview with Saba Cheema, Mr. Farrokh's wife, on May 17, 2016;
7. Interview with Jaleh Sheath, Mr. Farrokh's sister, on May 30, 2016;
8. Interview with Sara Hoekstra, Mr. Farrokh's sister, on June 2, 2016;
9. Criminal Information;
10. Statement of Facts filed March 18, 2016;
11. Criminal Complaint dated January 16, 2016;
12. Affidavit in Support of Criminal Complaint dated January 16, 2016;
13. Discovery Letter dated February 11, 2016;
14. Protective Order dated February 25, 2016;
15. Transcript of conversation between Joseph Farrokh, Wisam, and Abu Zubayr dated November 21, 2015;
16. DVD containing audio recording of a conversation between Joseph Farrokh, Wisam, and Abu Zubayr on November 20, 2015;
17. DVD containing audio recording of a conversation between Joseph Farrokh, Wisam, and Abu Zubayr on November 21, 2015;
18. DVD containing audio recording of a conversation between Joseph Farrokh and Abu Zubayr on December 15, 2015;
19. DVD containing audio recording of a conversation between Joseph Farrokh and Abu Zubayr on December 15, 2015;

- Zubayr on January 8, 2016;
20. Alexandria Department of Corrections (DOC) records, multiple dates;
  21. Records from American School of Nursing and Allied Health (ASNAH) from September 12, 2014 to October 24, 2014;
  22. Northern Virginia Community College (NVCC) academic records, multiple dates;
  23. Academic records from Parkland School District in Allentown, Pennsylvania, multiple dates;
  24. Letter from Joseph Farrokh to Ms. Blanchard, presentencing evaluator;
  25. Declaration of Charles J. Scott dated July 1, 2016;
  26. Declaration of Lindsay Page dated July 1, 2016;
  27. Letter from Saba Cheema, no date;
  28. Letter from Donna Farrokh, no date;
  29. Witness Declaration from Esi Gyenin, Joseph's instructor at American School of Nursing and Allied Health, dated July 2, 2016;
  30. Witness Declaration from Monica Hixon, Joseph's coworker at Virginia Hospital Center, dated July 2, 2016;
  31. Witness Declaration from Hamid Makay, Mr. Farrokh's coworker at Virginia Hospital Center, dated July 2, 2016.

### **STATEMENT OF NONCONFIDENTIALITY**

Prior to the clinical interview, I explained the nature, scope, and purpose of this evaluation. The limits of confidentiality, and the non-therapeutic role of the forensic evaluator, were also explained in detail to the defendant. Mr. Farrokh cooperated with the evaluation.

### **IDENTIFYING INFORMATION**

Joseph Farrokh, a 29-year-old Caucasian male, who pleaded guilty to Attempting to Provide Material Support to Designated Foreign Terrorist Organization in violation of 18 U.S.C. § 2339B. At the time of his arrest, Mr. Farrokh worked intermittently as a driver for Uber Technologies, Inc., based in California and resided with his wife, Saba, in Woodbridge, Virginia. Mr. Farrokh is expecting his first child. He had recently quit his job as a Patient Care Assistant at the Virginia Hospital Center, in Arlington, Virginia.

### **RELEVANT HISTORY**

Born in the Pennsylvania on June 19, 1987, Joseph Farrokh was the youngest child of Donna and Hashem Farrokh. Hashem Farrokh emigrated from Iran in his twenties in order to attend the University of Buffalo for electrical engineering; he later received his Masters degree from Penn State in this field. Donna Farrokh, who is from Buffalo, NY, was raised in a "traditional and strict" family. Mr. Farrokh has two older sisters, Jaleh (40) and Sara (37).

**Birth to the age of 13 (Pennsylvania):**

During Mr. Farrokh's elementary school years, he and his family resided in a single family home in Schnecksville, Pennsylvania, located in the Lehigh Valley. Mr. Farrokh's mother reported that Lehigh Valley was a conservative area with no real diversity. The interaction between Mr. Farrokh's parents was tense; a lot of arguing and his mother tended to be more vocal while his father tended to say very little. Furthermore, Mr. Farrokh's mother tended to be overly involved in her children's lives and while his father was the opposite and was not involved at all. Mr. Farrokh's mother recalled taking him to karate classes, golf lessons, baseball games, and lacrosse games in middle school. Mr. Farrokh's father, however, recalled that during this timeframe he felt "[Joseph] had some weakness. He was not focusing and never finished anything. He would give up in any interest that he had".

At the request of Mr. Farrokh's father, Hashem, Mr. Farrokh and his sisters began attending Muslim Sunday school with an interfaith program that was started within the community. Hashem grew up in Iran, a Muslim country that practices the Shiite branch of Islam. Donna, Mr. Farrokh's mother, grew up as a Presbyterian Christian. Mr. Farrokh participated in Sunday school activities from the age 5-6 to approximately the age of 8-10 when he "refused" to go. Donna recalled that her children celebrated both Muslim, as well as Christian holidays throughout their childhood. Mr. Farrokh reported that he did not identify himself as a Muslim growing up.

Mr. Farrokh's sisters recalled that because of the big age difference (12 & 9 years) between the siblings Mr. Farrokh spent most of his time alone while they were away at college. They also reported that their parents were stricter with them; Jaleh, Mr. Farrokh's older sister, reported that Mr. Farrokh was able to bring girls home in the 7<sup>th</sup> grade. Mr. Farrokh stated that he felt close to his family while residing in Pennsylvania and that "we did stuff together like sports and go to places together". Hashem reported that his children "knew I loved them and [I] did things for them but I wasn't showing it. I wasn't a hugger. I got them anything they wanted and even now I try to help financially".

Mr. Farrokh attended Parkland School District located in Allentown, Pennsylvania. Academic records indicate that he was a bright student who excelled in his course work. Donna reported that he was awarded the Presidential Medal for Academic Excellence up to middle school. Mr. Farrokh completed the 6<sup>th</sup> grade Orefield Middle School with a GPA of 4.0. Mr. Farrokh attended two quarters at Orefield Middle School before transferring to Pacific Academy Preparatory School, a private school, in Richmond, California. On this transfer application Mr. Farrokh's teachers acknowledged that he was academically outstanding. Although Mr. Farrokh "seems to have a lot of friends [and] had lots of followers" he could be "led astray by others who do not stay on tasks" and "does require supervision to remain on tasks". He was also "hesitant to develop friendships with those who were not part of his 'cool' crowd". Additionally, one teacher noted, "Joe is the type of student to play the role of class clown. However, he plays this role sort of behind the scenes. In nonstructured settings such as lunch, gym, etc. he gets himself into trouble with his behavior". Another teacher indicated that Mr. Farrokh "is insecure and thereby seeks approval from friends

with underhanded behaviors” but “if he [Joseph] uses his ability as a leader and a student more productively, he would accomplish great things”.

**13 years old to mid-twenties (California):**

In 2001, Hashem accepted a job with a startup company in California and Mr. Farrokh and his parents relocated to Richmond, California into a one-bedroom apartment. His sisters, Jaleh and Sara, remained in Pennsylvania. Mr. Farrokh recalled that he was very unhappy and angry over having to leave his friends behind and began “acting out a little because [I] moved away from everything I knew at that time...[I] thought it was the end of the world”. Donna recalled that prior to their move “Mr. Farrokh’s classmates and lacrosse team mates had a going away party for him. The boys and girls made him a large card on poster board”.

Shortly after arriving in California, Hashem was forced to switch companies, which increased his commute time significantly and did not allow him to spend time with Mr. Farrokh. Mr. Farrokh stated that he saw his father “at night and weekends”. Donna, who had also begun working at this point, reported that most of the parenting “fell on” her. By the time Mr. Farrokh entered the 8<sup>th</sup> grade the family had moved into a townhouse in the small town of Benicia, California. Mr. Farrokh’s behavior had intensified; he was increasingly angry and disrespectful towards his mother and at times would engage in yelling/screaming fights with her. He also began to skip school in order to “go to a friend’s house” or refused to attend school all together. Donna recalled having to contact the truancy officer on one occasion to assist her in transporting Mr. Farrokh to school. Donna reported that she requested multiple times for Hashem to assist her with Mr. Farrokh’s truancy, however, due to his work obligations he was not able to be around the house to provide any assistance. Jaleh recalled, “No one was there to enforce that he [Joseph] was going to school”.

When Mr. Farrokh was 16 years old Hashem moved to Virginia to work at the Patent Office after being unemployed for approximately one year. Mr. Farrokh’s parents believed that it was best that Donna and Mr. Farrokh remain in California in order to avoid uprooting Mr. Farrokh a second time. Donna also reported that she did not want to leave her employment in order to move to Virginia. Hashem reported that it was hard for him to “move away but it was to take care of the family”. Mr. Farrokh’s sisters, however, believe that “mom [Donna] was happy to stay and be separated” due to their parents’ ambivalence about their marriage. This arrangement in which Donna and Mr. Farrokh resided in California and Hashem in Virginia continued for approximately eight years. Hashem stated that he would come back to California about two to three times a year for the holidays. He also reported that there were very limited phone conversations with Mr. Farrokh between these visits.

Mr. Farrokh began attending Benicia High School in California. His attendance continued to be sporadic. His academic performance had significantly declined. Charles J. Scott, Mr. Farrokh’s childhood friend, recalled that in high school Mr. Farrokh told other classmates that he was Italian and from the East Coast; everyone began referring to Mr. Farrokh as “Jersey Joe”. His sisters stated he watched a lot of Sopranos and Godfather. His mother recalled, “family was very important to Mr. Farrokh. [He] didn’t like me telling people our business”. Jaleh stated that Mr. Farrokh began to “struggle with his identity...he was taking on their culture and acting like a gangster...[he was] trying to find his way. I have picture of him with a cross. He didn’t know what to do and [there was]

no one to guide him. [He] didn't get what he needed and was a lost soul...my mom was working all the time and my dad was a little more hands off. [He] left him (Joseph) when he needed him".

Towards the end of his senior year in high school, Mr. Farrokh was expelled from school for "throwing clay at a classmate. He came up to me and I punched him". Mr. Farrokh stated that he "thought it was cool and was trying to fit in in order to get their approval since I didn't have my parents approval". Mr. Farrokh was able to take a state exam and obtained his high school diploma in May 2006.

After high school Mr. Farrokh went to community college to "please my parents" and felt a lot of pressure to be successful. Jaleh stated that there was a significant amount of pressure on all the children to be successful in school. She recalled, "If [you are] not an engineer and doctor [then] we all felt that [we] better do something big". Sara reported that it was extremely important to their father that all the children attend college and "get a degree and support" themselves". Despite his desire to please his parents, Mr. Farrokh dropped out of junior college after one semester. He stated that his father was upset over this matter. Hashem reported that he would get angry with Mr. Farrokh. Furthermore, he reported that "I would pay for school and he would attend and before the end of the semester he would leave, we would have a strong discussion and that would be it".

Around the time of his disenrollment from community college, Mr. Farrokh was charged with Possess/Sell a Switch Blade (18 years old) and Driving Under the Influence of Alcohol (19 years old). Mr. Farrokh attributed these arrests to the fact that he was trying to get his parents attention. He reported that his father was "disappointed but he didn't come to see me" after his arrest for DUI.

Mr. Farrokh attempted to get his life back on track and began to work at a restaurant called Angelo's. Donna stated that his work ethic was amazing; he was always on time, did not skip work and was frequently called when the restaurant needed additional help. Soon after he began working at Angelo's, Mr. Farrokh became very good friends with his coworkers who were of Hispanic heritage. He quickly thought himself to speak Spanish fluently and began to translate for other employees who only spoke English. Mr. Farrokh began to attend family functions with these individuals (i.e. cookouts on Sundays). Mr. Farrokh recalled that he "wanted the closeness of the family and that I didn't have with my own family, a sense of brotherhood that they would have my back". Jaleh believed that Mr. Farrokh was "trying to find his own identity...he would wear a cross and had rosary in his room". Mr. Farrokh decided to start a landscaping business with a few of these individuals. His parents reported that he was excited about this new opportunity and was teaching himself how to operate the business through his research online. Hashem recalled that Mr. Farrokh was able to get a "few jobs" but that they encouraged him to go back to school, because "education was everything", versus continuing to pursue this entrepreneurial opportunity. Eventually Mr. Farrokh's landscaping business was dissolved and Mr. Farrokh returned to working at a restaurant. Sara remembered that Hashem was "on him for not going to school and this is something my dad cares about. Go to school, get a degree and support yourself".

When Mr. Farrokh was 22 years old, Donna decided to move to Virginia to be with Hashem. Mr. Farrokh, with the financial assistance of his parents, moved into his own apartment and re-enrolled in the local community college for a semester. During this semester, Mr. Farrokh was enrolled in a

philosophy class in which his professor reviewed the foundation of multiple religions. Mr. Farrokh recalled that it was at this point that he began to do “more soul searching and had a realization that there had to be a God and decided that Islam made the most sense”. He recalled that he informed his father that he had decided to become “a good Muslim and [my] dad was pleased with it”.

**Drug use:**

Mr. Farrokh stated that he began to drink alcohol and smoke marijuana at the 15 years old, shortly afterwards he recalled that his father moved to Virginia. In 2009, Mr. Farrokh was introduced to opiate pills (mostly oxycodone) by a friend. Mr. Farrokh’s occasional usage of opiate pills quickly increased to daily consumption (3-4 pills a day) with an average cost of \$100 per day. Mr. Farrokh continued abusing opiate pills on and off from 2009 until late 2013, with his longest length of sobriety occurring when he moved from California to Virginia. He relapsed approximately a year after moving to Virginia when he met “someone at the mall who was selling them [opiate pills]”. He stated that within a month he was back to abusing opiates pills 3-4 times a day. Mr. Farrokh stated that he was extremely “ashamed and hated [the] fact that [I] was addicted to it and always made myself stop”. He reported that the first day of his sobriety was the first day that he “began to pray five times a day...the structure [of Islam] helped me remain sober”. He stated that he “didn’t take drugs because I knew it wasn’t in Islam”. Mr. Farrokh reported that Islam filled his cravings and the sadness that he felt and that he was trying to change himself “to be a better person”. He reported that when he was high on opiate pills he was “relaxed, not worried about anything. [I was] content and happy with whatever I was doing”. However, he reported that in general he “wasn’t happy. [I] didn’t feel independent because [I was] living with my parents and they would tell me what to do”.

Mr. Farrokh reported that he intentionally hid his addiction from his family because he was “ashamed” and “did not want them to know and to lose respect for me”. He reported that he was not sure of his parents were aware of his addiction. He stated that he would “be irritable, [have] glossy eyes, [get] sick, and [become] angry” when he was withdrawing from drugs. Jaleh reported that she knew he was struggling with prescription drugs but was unsure specifically what he was addicted to. She recalled having a family intervention in which Mr. Farrokh was confronted about his drug use. She stated that this intervention occurred shortly after her cousin died from a drug overdose. She reported that Mr. Farrokh became extremely angry and denied using any drugs. Jaleh remembered that it was shortly after this confrontation that Mr. Farrokh went “all into” religion and distanced himself from her for confronting him. As of today, Mr. Farrokh stated that he has not spoken to his family about his addiction.

**Mid-twenties to present (Virginia):**

Mr. Farrokh relocated to Virginia when he was 24 years old, about 8 years after his father began residing in Virginia. He attributes this relocation primarily to “getting away from drugs”. He also reported that this move decreased the financial hardship that he felt he had placed upon his parents while living in California. Shortly after residing with his parents in Virginia, Mr. Farrokh registered at Northern Virginia Community College (NVCC). Academic records indicate that Mr. Farrokh began attending classes in the fall of 2012. His grades were satisfactory the first two semester of his enrollment at NVCC (fall 2012 & spring 2013), however he withdrew from most of his classes

during the summer semester of 2013. Mr. Farrokh's last cumulative GPA at NVCC was 2.594.

Mr. Farrokh began working at Potomac Mills Mall while attending NVCC. He first began working at a kiosk selling toy helicopters. Then he moved to another kiosk that was operated by Cellairis, a cellular telephone company. He worked for Cellairis for about two years. Mr. Farrokh stated that during this time there was a lot of tension between him and his parents at home due to his lack of interest in school. After Mr. Farrokh stopped attending NVCC, his parents informed him that he would have to move out of their home and financially support himself if he did not return to college. Hashem stated that he felt "bad" over giving Mr. Farrokh an ultimatum but that he "wanted him [Mr. Farrokh] to think twice" about his decision; "education makes you a better person". Mr. Farrokh was given a few months to find his own apartment. He eventually moved out (around the age of 26) and began to live with three Muslims. Mr. Farrokh's parents reported that once he moved out Mr. Farrokh became more respectful and would come visit on the weekends. However, Mr. Farrokh did not inform any of his family members of the address of his new residence. Jaleh reported that she "thought it was weird but as long as he wasn't on drugs they [Mr. Farrokh's parents] let it go".

Mr. Farrokh successfully completed and became certificated as a Nurse Aide (CNA) through the American School of Nursing and Allied Health (9/12/14 to 10/24/14). Esi Gyenin, Mr. Farrokh's instructor at American School of Nursing and Allied Health, reported that Mr. Farrokh was such an "excellent" student that she recommended that he work at her place of employment, Virginia Hospital Center. She indicated that Mr. Farrokh wanted to be nurse "to help and serve other people" and that he was "passionate in his pursuits" in future career advancement, Ms. Gyenin and Mr. Farrokh spoke about once a week; they often spoke about Mr. Farrokh's desire to go back to school and obtain additional certifications. Monica Hixon, Mr. Farrokh's coworker, stated that Mr. Farrokh has a "strong work ethic [and] volunteered to take on tasks". Furthermore, she stated that he was "compassionate towards patients". Another coworker, Hamid Makry, reported that Joseph "really enjoyed interaction with patients. [He] was kind, helpful, and always had a great attitude". Despite these major accomplishments, Hashem reported that he asked Mr. Farrokh "why not get a decent degree [college degree] so if you get (sic) another kid [you can provide for him/her] because [you] only get \$30,000". Ms. Hixon reported that one day Mr. Farrokh abruptly gave his two week notice. She indicated that her attempts to have him remain that the hospital were unsuccessful.

Mr. Farrokh and his wife met in November 2013 while they both worked at the Potomac Mills Mall. His wife, Saba Cheema, reported they were just coworkers at first and then progressed naturally into more. On August 8, 2015 the two married. Mr. Farrokh's sisters reported that they did not meet Saba until shortly before the wedding. Jaleh recalled that Mr. Farrokh and her got into a fight the night before his wedding over the fact that she has a cross in her car. She stated that he was not acting like himself and was "almost in a trance like, brain washed and in a cult" during his wedding. She reported that he was continuously repeating Surah<sup>1</sup> throughout the night to himself.

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<sup>1</sup> Surah is what chapters are called in the Qur'an.

**Conversion to Extreme Islam:**

Mr. Farrokh reported that in his mid 20s he realized that he was not successful in his life. He felt to be successful meant being successful financially and having a career. Given the fact that he did not have these things, he decided that he would be the “best Muslim for the next life”; he would be morally successful if he could not be financially successful. He felt that Islam was the “truth and it will help define success for me”. At that time, Mr. Farrokh felt that being a martyr was the best way to be best Muslim. He believed that if Islam is the truth then why not focus on eternity and not the present. He reported that although he began feeling this way while in California he did not begin practicing these philosophies until he moved to Virginia; he felt an internal conflict while in California because some of his closest friends were not Muslim. Upon relocating to Virginia, Mr. Farrokh only associated with Muslims. It was at this point that he began to view himself as an individual who converted to Islam.

Both Saba, as well as Mr. Farrokh’s family, reported that Mr. Farrokh became extremely religious after they got married. He started becoming obsessed with Islam and would talk about it continuously. Saba recalled that Mr. Farrokh was always worried about Syria and the people there and was thinking about ways in which he would be able to help them. She stated that he began reading a lot of articles about what was happening in Syria. Donna reported that Mr. Farrokh would come to their house and would get fights with Hashem over not being a good Muslim (Hashem is Shiite branch of Islam while Mr. Farrokh is Sunni branch). She recalled that his behavior also changed; he would not eat with his left hand<sup>2</sup>, brushed his teeth with a stick<sup>3</sup> and began going to multiple mosques and fasted frequently.

Mr. Farrokh believes that approximately six months before his arrest he became more extreme and that this shift was quick. He stated that looking back to that period of time he thinks to himself “what was wrong with me. I got brainwashed”. Joseph reported that he began to communicate more frequently with his codefendant, Mahmoud El Hassan, around September 2015 to January 2016. He reported that it was during this timeframe that he began noticing the “injustice and hearing radical talks online and listening to them”. He stated that at first he thought they [ISIS] should be able to defend themselves but not kill innocent people. However, he began to hear more extreme viewpoints online that justify killing. He reported that he believed that he would mainly be a soldier and battle other soldiers.

Joseph reported that “I love my family but I never had that sense of closeness with my family. [We] didn’t talk about feelings”. There was never any structure established in Joseph’s life. He reported that he tended to act out in order to get the attention of his parents but was unsuccessful. He realized that he was not successful and decided that it was better to be successful in the next life by being a good Muslim in this life. He reported that Islam provided the structure that he never had. He stated, “it helped me to stop the bad things I was doing”. Mr. Farrokh reported that he was drawn to ISIS

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<sup>2</sup> In Islam, using the right hand to eat is a way that one shows proper etiquette with people; one does not shake hands with, take things from or give things to them with the hand with which one removes impurities. It is also a sign of hope that Allaah will make us among those who are on the right hand.

<sup>3</sup> “Miswak” is a teeth cleaning twig made from the Salvadora persica tree. A traditional and natural alternative to the modern toothbrush, it has a long, well-documented history and is reputed for its medicinal benefits.

because it provided him with 1) a sense of brotherhood 2) a sense of purpose 3) a sense of family and not feeling like he was a failure and 4) a sense of being successful in this life and the next. Mr. Farrokh embodies many traits indicative of a person that has developed a fragmented and depressive sense of self. Mr. Farrokh lacks adequate self-esteem and is unable to soothe himself in painful moments. While at times Mr. Farrokh acknowledges his intellectual abilities, he often lacks self-pride in his accomplishments and chastises himself for not performing at his full potential. His self-experience is one of vague falseness, shame, emptiness, incompleteness, and inferiority. The result of Mr. Farrokh's fragmented sense of self is a chronic state of guilt, helplessness, and irritability that has led to the anger and opiate dependency that he has experienced throughout his formative years.

## **CONCLUSION:**

Joseph Farrokh is a 29-year old Caucasian male who pleaded guilty to Attempting to Provide Material Support to Designated Foreign Terrorist Organization. Mr. Farrokh denied any past mental health services and substance abuse treatment. However, given his long reported history of abusing prescription medication, which is corroborated by multiple collateral sources, Mr. Farrokh meets criteria for Opiate Use Disorder, sustained remission. He does not at this time exhibit any symptoms of an active mental illness.

Mr. Farrokh comes from a family in which he reports he did not feel a sense of emotional closeness. His mother tended to be overly intrusive and at times would intensify her interactions with Mr. Farrokh when discussing him with others. Her communications with her son, at times could be aptly described as enabling, controlling and chronically judgmental. His father was emotionally and physically absent during Mr. Farrokh's critical developmental period. Given the age gap between Mr. Farrokh and his siblings, Mr. Farrokh experienced similar family environment as if he was a single child for a majority of his life. Throughout the entirety of Mr. Farrokh's life, enormous pressure was placed upon him to become successful through higher education, and when he failed to live up to his parents' expectations, his failures were met with harsh and judgmental recriminations that underscored his parents' disappointment in him and his sense of failure.

As a young adolescence, Mr. Farrokh's was moved from Pennsylvania to California. This move was a significant turning point for Mr. Farrokh. While in Pennsylvania, Mr. Farrokh appeared to be well adjusted and interacted positively with his peers; he was popular and a leader and did not exhibit anger. He also felt emotionally close and connected to his family and had a sense of belonging. The move to California took Mr. Farrokh away from his sisters, as well as the life that he had known. Although Mr. Farrokh's basic financial needs were met in California, his family failed to properly prepare him for the impact of this relocation. To the contrary, his parents provided no sense of normalcy or validation for Mr. Farrokh's sense of loss and ignored his increased level of frustration and anger surrounding this loss. As a result, Mr. Farrokh did not develop a sense of his own unique capacities, talents, and characteristics necessary to form a sense of natural, healthy exhibitionism at this developmental time. Therefore, he was unable to develop the confident, hopeful, and productive core of identity, individuality, and well-being.

For years Mr. Farrokh was unable to acknowledge the impact of having an emotionally absent father who ultimately absented himself from Mr. Farrokh's life in his mid-teens. Following his father's departure from California, Mr. Farrokh's relationship with his mother became increasingly complicated, emotion-laden and inappropriate wherein both appear to have taken out their feelings of isolation and frustration out on each other. As dysfunctional as the relationship became, it appears that the tie to his mother, despite its complications, was preferable to the isolation he would have experienced alone. In an attempt to maintain his own identity, while he was tied to his mother, Mr. Farrokh hid beneath the masquerade of disrespect, aggression and anger. These experimental identities gave Mr. Farrokh a temporary sense of strength, cohesion, and self-esteem rather than feeling weak and vulnerable. During his childhood, Mr. Farrokh was not able to develop empathy or self-esteem for himself and, therefore, acted out towards society as a defense to cover up the flaws in his self-image. Mr. Farrokh's parents' responses were conditional and chronically unempathetic (i.e., absent, flat, anger, disappointment), thus inhibiting the development of a strong sense of identity within Mr. Farrokh and resulted in an impaired capacity for him to develop realistic goals, regulating ambitions and ideals, and establishing a sense of belonging and being like others. Furthermore, his lack of identity caused Mr. Farrokh to feel empty, bored, and apathetic and made him vulnerable to addiction and other self-destructive behaviors, and contributed to him becoming susceptible to developing radical views.

Confrontation by Mr. Farrokh's family in regards to his failures (i.e. school) and addiction, underscored the conditional nature of their regard and led to deep feelings of inadequacy and humiliation for Mr. Farrokh; his sense of core identity was more fragile than the superior image that he attempted to portray. On the surface, Mr. Farrokh may have looked very self-assured, but internally he was in a constant search for reassurance that he was acceptable or admirable or valuable; this made Mr. Farrokh extremely vulnerable to first falling in with friends and associates who were part of a drug culture, and later the radical philosophies of ISIS.

Mr. Farrokh is an individual who has been in search of his identity throughout his life. His father emigrated from Iran and his mother was born and raised in the United States. Mr. Farrokh is a first generation American; he is unable to fully identify himself as American or fully identify himself as Iranian. Not uncommon to other first generation Americans, Mr. Farrokh was confused in regards to his core identity and which culture to identify with, resulting in a profound sense of isolation and aloneness in the world. In response, Mr. Farrokh developed the adaptive strategy of adopting, embracing and identifying with others – essentially taking on new identities because he lacked a clear sense of who he was - as a way to assimilate and connecting with them and the world, and avoiding social isolation. In the absence of having a clear identity of his own, Mr. Farrokh tended to seek out and take on the identity of others quickly to make up for the functions he lacks within himself in order to heal. This helped temporarily fill the emptiness and diffuse the shame that he felt internally; thus reassuring Mr. Farrokh that he mattered in the world. He first identified himself as Italian, next Hispanic, still later as "thuggish", and finally the identity of being an ISIS member. However, his quick adaptation was, by its very nature, extremely shallow and superficial in its demeanor and do not represent his true character. Mr. Farrokh's main motivation for this was to support his self-esteem, self-cohesion, and sense of self-continuity; he did not know who he was or what really mattered to him.

This sense of isolation, loneliness and lack of personal identity is what made Mr. Farrokh vulnerable to the extreme philosophies of ISIS. Mr. Farrokh adopted the identity of an ISIS member because it provided him with a sense of brotherhood, a sense of purpose, a sense of family and not feeling like he was a failure and a sense of being successful. These are the same qualities that drew him to adapt the Italian culture in adolescence and the Hispanic culture in his early 20s. During periods that Mr. Farrokh was unable to take on the identity of others he was left feeling empty, sad, alone and questioning his purpose in life. It was during these periods that Mr. Farrokh would retreat to opiate pills as a means to numb his lack of self-concept and self-esteem.

At the time of this evaluation, Mr. Farrokh expressed feelings of shame, embarrassment and disappointment in himself for the thoughts and behaviors he expressed during his road to becoming radicalized and has since rejected these viewpoints; Mr. Farrokh now condemns ISIS, has admitted his crime and pleaded guilty, and has committed to cooperating with the governments including testifying against his codefendant. This last point presents a particularly significant statement of his changed attitude given the fact that he reports having a close relationship with his codefendant and genuine concern for his well-being. Mr. Farrokh has shown insight into the underlining reasons behind his need to adopt the identity of ISIS (i.e. lack of identity and self-esteem), including an ability to identify how he became vulnerable to extreme viewpoints due to his sense of loneliness, isolation, lack of identity, and need to have a purpose in life. Furthermore, Mr. Farrokh has begun to develop skills to manage his issues in the future. First, Mr. Farrokh appears to have built a stronger interaction with his nuclear family in which he is more open and honest with them. Second, Mr. Farrokh has begun to take responsibility for his opiate addiction. After years of masking and denying his addiction, Mr. Farrokh has expressed the desire to share his experiences during his addiction with his family and make amends with anyone whom he had harmed during his addiction<sup>4</sup>. He has expressed the desire to enter a drug treatment program to assist him better recognize his triggers and help him maintain his sobriety. Next, Mr. Farrokh's strong work ethic throughout his addiction and radicalization indicates he continues to have strong desire to be a productive and industrious member of society. Finally, Mr. Farrokh has indicated that he would like to participate in individual psychotherapy in order to develop a stronger core identity and avoid adapting any future maladaptive behaviors.

The findings, conclusions, and opinions presented here are based on the procedures and information described earlier in this report. In the event that new information becomes available, my conclusions and opinions are subject to review and possible modification.



Sahair Monfared, Psy.D.  
Licensed Clinical Psychologist

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<sup>4</sup> Making "a list of all persons we have harmed, and [being] willing to make amends to them all" is step eight of the Twelve Steps of Narcotics Anonymous. Narcotics Anonymous World Services, Inc., *Twelve Steps and Twelve Traditions* (1998).



# **EXHIBIT E**

Dear Judge Trengai:

Shame is a terrible thing and it nearly cost me my life. Since I can remember I have felt shame and believed I was a failure. Shame was also what led me to want to go abroad to join ISIS to belong to something important and prove I had value. The decisions I made that led me to commit this crime came from feeling deep shame and my attempts to overcompensate for it. Over the past six months I have taken stock of my life and see that shame propelled me to this point. I deeply regret becoming involved in supporting terrorism and am sickened by the crimes ISIS is committing on a daily basis. I renounce ISIS, its actions, and its violent, extremist ideology. I hate what they stand for and I believe ISIS twists Islam and exploits people's concerns about injustice to radicalize and recruit. My own shame led me to believe ISIS was fighting a just cause, but seeing the truth about what ISIS is and what it does has helped free me from that ideology. My arrest and prosecution has given me the opportunity to understand that trying to join ISIS was driven by my own personal problems. I have recommitted myself to my wife, my unborn son, my family, my faith and living a law-abiding life. I will never again support violent extremism or its ideology.

Growing up my home life was not healthy or supportive because both my parents were extremely judgemental and I grew up feeling like I was a failure and did not measure up to their expectations. My sisters were a lot older than me, so I was raised almost as an only child. In Pennsylvania I had close friends, played sports and got good grades. But when I was 13 my parents uprooted me when we moved from Pennsylvania

to California because my father lost his job. Moving was very hard on me as a boy as I had left friends and a community in which I was close. At first in California we lived in a tiny one-bedroom apartment. I was lonely and frustrated and had no friends. I felt really angry at my parents because I went from having friends, playing sports and going to a school I liked, to having being alone all the time and going to a school where I didn't fit in. I didn't know how to tell them how much I was hurting, and I began to act out by arguing with them, skipping school and having disciplinary problems. I see now my anger and impulsiveness was a cry for help and I needed attention from my parents and a support system. I remember feeling that everything was my fault, I was no good, and that if I just acted right and improve my behavior it would all be better. But I was miserable, lonely and depressed and that went on for many years.

When I was 15 my father moved to Virginia for work, leaving my mother and me alone in California. No one ever asked me if I agreed with this and it seemed that no one cared. My mother then started working full time. From then on I was on my own all the time and things started to get even worse for me. I began skipping school more and getting into more serious trouble. I started to experiment with alcohol and marijuana. My relationship with my father at that time was non-existent and my relationship with my mother was very bad as well. I remember feeling a very strong guilt and shame that everything bad that was happening was my fault-angry all the time, and I needed to just act right. Also my whole life there was always a great insistence on school and to be successful in life, especially from my father.

If I had a successful career and was successful financially than nothing else mattered, including who I was as a person. My grades went downhill and when I would talk to my father this is all that he seemed to care about and he'd say things that made me feel even worse. He never asked me what was bothering me, if there was anything he could do to help me, or show any interest in anything other than my bad grades. I only saw him a couple times a year and spoke to him on the phone infrequently, but when I did talk to him it was always about being a bad student and being ungrateful. This continued until my Senior year of high school when I was expelled because of having disciplinary problems, mainly truancy.

After high school I began to work full time, mostly at restaurants. I developed a strong work ethic and did well in my jobs. It was the first time I remember feeling good about myself. At one restaurant I became close with a couple of Mexican co-workers and started to learn Spanish. I see now it was because I wanted to belong to something, and I wanted emotional support. Though they had their own troubles and drank alcohol frequently, they did not judge me and I started to feel a kinship with them. However, my anger continued and I continued to use alcohol as a way to self-medicate. My mother was still alone in California and I did not have a very good relationship with her, or with my father in Virginia. I continued to act out and get into trouble. I made some very poor life decisions and got arrested twice, once for drunken driving. During all of this time I felt extreme guilt and was in pain because I was not being the person I wanted to be nor who my parents wanted me to be. Their reactions thru all of this were that things were my fault and I just needed to improve my

behavior and go back to school. (enroll in college classes) Looking back now I can see I needed counseling or therapy to address my personal problems, I was in a lot of pain but did not recognize it or know what to do.

At about 22 I tried prescription opiate painkillers a friend gave me for the first time. I tried them because I thought it would be cool and a lot of people were using them. When I used the drug, which I think was oxycontin, my emotional pain went away. Soon I started to use the drug on a daily basis and before long I was addicted so I started to get them regularly from a few different people who sold them. When I used opiates I did not feel the pain anymore and all my anger and feelings seemed to disappear. In a lot of ways the drugs would take away the pain while I was high and fill the emotional void in my life, similar to the way that Islam did later. I enrolled in community college in California but continued using the drugs. I felt a deep shame for using drugs and tried to quit them many times on my own without any treatment. Every time though, I would start to use again, and each relapse made me feel worse about myself. Even though I knew drugs were terrible and I had developed a serious problem, I did not want to face the reality that I was an addict. I hid my drug use from my family and non-drug using friends. In college I was re-introduced to Islam but was not a practicing Muslim. In 2012 I moved to Virginia to be closer to my family and to get sober. I promised myself I would get clean.

I stopped using drugs before leaving California. When I arrived in Virginia I started working and enrolled at

Northern Virginia Community College. I promised myself to turn my life around. After several months, while working to support myself, I met some people who were using and selling prescription drugs, and I started using again. Even though I had abstained for a period of time, I never got treatment or dealt with the reasons for why I used drugs in the first place. I still had anger and emotional problems. The shame and pain I felt from being addicted to drugs was so great it was almost overwhelming and caused me to want to use the drugs even more. I was miserable and made everyone around me miserable, which just made everything worse. In late 2013 I made another commitment to stop taking drugs on my own again and the way I did this was to begin practicing Islam devoutly, praying five times every day and attending Muslim services at nearby mosques. I continued to work full time. My conversion to Islam was something my father was happy with as he is a practicing Muslim.

In many ways I felt like a failure because I did not have a successful career nor was I successful financially. Becoming a practicing Muslim in many ways helped fill the void I had as a person which started in childhood and continued to adulthood. All of this was left unaddressed and my drug addiction was untreated. Even though I was not abusing substances my addiction and reasons for using were still very much there. I would have greatly benefitted from any sort of drug treatment or any other programs to help me cope, such as therapy, etc. I had no emotional support system nor anybody who cared about me and my development as a person. It has been that way since as far back as I can remember.

I wanted to change my life and return to school. In the fall of 2014 I took courses and received a certificate which allowed me to get a job as a tech at Virginia Hospital Center in Arlington. I was always a hard worker and exceeded in this one part of my life. I wanted to work in the hospital to do good and help take care of people. All my life I have been a kind person and very empathetic. In the summer of 2015 I got married to an acquaintance I knew from my previous job. Up until recently I had kept my past drug use hidden from friends and my wife.

In 2015, as I was deepening my religious faith, I viewed ISIS propaganda videos on the internet for the first time. Around the same time, I started to spend time with my codefendant Mahmoud Amin Mohamed Elhaassan, who already had the extremist views and was knowledgeable about the Quran and the principles of jihad. Elhaassan spoke Arabic and had been raised abroad and he welcomed me like a brother. He was also very politically aware and expressed outrage about the Bashar Al Asaad regime in Syria. I started to adopt this radical ideology and began making plans to go to Syria to join ISIS.

All my life I have struggled to make healthy decisions because I was angry and lost, and it got even harder when I was using drugs. Because I finally stopped using drugs on my own through religious devotion, I became motivated to deepen my faith and become the best Muslim I could be. In a very short span of time, just a few months, I began to adopt very extreme views as an expression of what I believed to

be true Islam. The twisted videos I watched, portrayed ISIS's sick ideology as Islamic truth, and I accepted that. The ISIS propaganda videos showed a sense of community and brotherhood, something which I always craved. I needed that sense of belonging. The idea to travel to Syria to take part in fighting, was made to seem like a way to do something great and become the best Muslim I could be. I felt as though I was getting older, and this was a way to be truly successful and pious. Thru Elhaassen I met someone who introduced me to people that told me they would help me travel to Syria. Together with them we planned my travel overseas. Through all of this I had many doubts. I thought I would never have to do anything I didn't want to do and that I could leave anytime. I expressed to them I could never do certain things like those attacks committed in Paris, suicide bombs, etc. I felt pushed by them to do certain things, such as give a copy of my passport, say the oath of allegiance to ISIS, and say that I would be willing to kill American Soldiers in Iraq if I had to. I don't say this to deny responsibility and I don't blame the FBI or the confidential informants for what I did. I tell you this only so you can see that I am not saying I was brainwashed. I was impaired and making bad decisions and this made my consent to doing things easier. But I had not lost all my faculties of reason or all my values. I was willing to join ISIS to fight Asaad, even if I did not agree with everything it was doing.

The night before and the morning I was going to the airport, I felt a deep sense of sadness and regret like I have never felt before in my life. I began to think

of opportunities I could abandon these plans and go home but felt that I had something to prove. Looking back at that I can see I was just as lost as when I was using drugs. Its like religion was my new addiction, and proving I was the best Muslim was like the search to get high. I am deeply ashamed for doing this and turning away from what I really believe and what God really wants.

Looking back, the decision I made to do this horrible crime was less of a decision because of deep-rooted extremist ideologies, and more of a continuation of extremely distorted thinking and very bad life choices. I had went to the extremes in religion just as I had went to the extremes in drug use, as well as before that in my teenage years. When I now see the atrocities committed by ISIS on a daily basis, like the shooting in Orlando or the bombing in Istanbul, I am disgusted by it, but I am also disgusted by myself. I wonder what kind of sick person could do such a thing, but then I realize, I was willing to join that same group. In no way do I want to be associated with anything like this. That is not who I am. I am not that kind of horrible person nor have I ever been. I am deeply regretful and ashamed of what I have done. I accept that there will be consequences that I will have to pay because of my actions.

My hope in writing this letter is to give you a better understanding of why I committed this crime, but also how to be clear that I take responsibility for changing myself. I know the consequences for my actions have had a devastating affect on my family and on my future, but I hope you can see that I am doing everything I can to make it right. Since my

arrest I have been reflecting on my life, and have confronted many issues that I never even talked about before; such as my drug use and my upbringing. I know I have been growing as a person. I am determined to continue to grow as a human being and get any professional help or support that I can. My family and becoming a healthy, good man are the most important things to me. My wife is pregnant with our son and expects to give birth at the end of July. I have improved myself tremendously and will continue to improve myself to be the best father, husband and son that I can be. I reject and condemn ISIS and what it does, and I will never again subscribe to extremist ideologies, nor would I ever make other extreme and disastrous life decisions because now I started to acquire the tools I need to help me make healthy life choices. Addressing my problems and becoming more aware of them will take time and hard work, but I am committed to doing everything necessary and taking as long as necessary to get the treatment and help I need.

Thank you for considering this.

Sincerely,

Joseph Farrokh

# **EXHIBIT F**

Dear Ms. Blanchard:

June 15, 2016

During our previous meetings you asked me questions about my drug use and I told you that I used to use marijuana and alcohol, but I also left information out so I am writing to clarify and provide more complete information. From about 2009 until late 2013, I regularly used prescription opiates such as Oxycontin, Oxycodone, Percocet and Vicodin. Over that time period I made numerous attempts to stop using the drugs on my own and had several periods of sobriety lasting days, weeks and sometimes a few months, but for the most part I was dependent on the drugs and used them on a daily basis. In 2012, when I moved to Virginia from Northern California part of the reason I moved here was to get clean so I stopped using them shortly before I left California. For the first few months I was in Virginia I did not use any drugs and did not drink alcohol, but after I started working at the mall I met a few people who sold prescription drugs and I started using drugs again and again became dependent on them and continued to use them until I finally quit for good. I quit on my own but the end of my addiction was helped by deepening my religious faith. The first time I prayed five times in one day was the first day of my sobriety.

I have never talked to anyone in my family about my drug use and it is something that I feel very ashamed of. While I was using drugs I intentionally kept my drug use hidden from my family and friends because I did not want them to know and to lose respect for me. To this day I have never admitted to my family or my wife that I had a drug addiction, but I will do so at the appropriate time. When I was using drugs I know my behavior made it very hard on my family and when they attempted to bring it up I would always deny using drugs. I have never received any rehabilitation for my drug use or other intervention and recognize that I still am susceptible to falling into that addiction.

My attorney has advised me to answer any questions you may have about my prior drug use and I will do so if you would like to continue our interview. I am interested in obtaining any information you have about drug rehabilitation programs that might be available in the Bureau of Prisons and would request any assistance you may be able to provide to me so that I can participate.

Sincerely,

Joseph Farrokh

# **EXHIBIT G**

July 5, 2016

Dear Honorable Judge Anthony J. Trenga:

I am Joseph's mother and I am writing to tell you how much I love my son and will stand by him and support him no matter what the outcome of his case. Since his arrest, his case has never been far from my heart and I have devoted countless hours thinking about the experiences that may have contributed to Joseph making such an unthinkable mistake. I believe that if you better understand his background information you will understand that the crime is an anomaly in Joseph's life and if given a second chance, he will never re-offend.

Probably the biggest single event in Joseph's life was when we moved from Pennsylvania to California when Joseph was thirteen. Joseph is our third child (he has two much older sisters), and prior to leaving for California, he was close to his sisters and our family was doing well. Joseph took karate and played baseball and lacrosse. He took bass lessons in elementary school and participated in performing for his school board. Joseph was a very good student and received the presidential award for academic excellence before he graduated to middle school. He made friends easily and palled around with his neighborhood peers. Joseph seemed like a very happy kid. Our family socialized often with close friends we made as Joseph's dad, Hashem, and I did not have family nearby. Hashem joined a very moderate mosque in the Lehigh Valley. It was started by professionals including doctors, engineers and college professors. It was very important to Hashem that his children learn about Islam. The girls went to Sunday school for many years but are not practicing Muslims and have married Christian men. As a young boy Joseph did not want to go to Sunday school. His father was very disappointed and chastised Joseph severely when he did not attend Sunday school. Hashem was working quite a bit and Sunday school was really the one thing Hashem wanted to participate in with his son.

When Joseph was in middle school, Hashem left Lucent Technologies and took a job with a startup company in California. Joseph did not want to move and the thought of leaving his friends, teammates (he was playing regularly on a lacrosse team and was quite good), and school (he was a very good student), made him very sad. In the middle of this life-changing event, I also found out Hashem had lost our entire life savings in some risky stock investments. Moving to California became the way we would get our family back on track financially. I see now that the

unresolved resentment and anger that Joseph and I felt about moving to California made it extremely hard to have a new start.

When we first went to California we lived in a small one-bedroom apartment Hashem had rented in an economically depressed area with a high crime rate. Joseph was upset about his uprooting and losing his sense of belonging and started acting out by becoming disobedient, for the first time, and careless with his school work. At a new school, in Benicia California, Joseph made some friends but they got into some trouble that was out of character for our son. Joseph started staying out very late for a fifteen- year old boy, and I would have to drive around to look for him. These problems led to a lot of conflict with Joseph that made my already depressed state much worse. I started to feel overwhelmed with anxiety and Hashem and I were having regular fights that too often occurred in front of Joseph. Because of the marital conflicts, it became impossible to get Joseph to follow our directions so I took him to counseling. Although Joseph's sessions with the therapist were unproductive, the psychologist did point out that Hashem was oblivious.

As the family conflict was escalating, Hashem lost his job, and then, in rapid succession he was hired at another engineering job far away from our home, that he lost a short time later. For the entire time Hashem lived in California he was not able to provide meaningful parenting to Joseph or support for me in my efforts to do so. This further increased the conflict between Hashem and I and I ended up feeling totally discouraged in trying to parent Joseph. I saw Joseph's interest in school collapsing and I did not know what I could do to help. I remember one morning pleading with Hashem to make Joseph go to school, and he just left for work. I was so frustrated, I called the middle school truant officer who came to the house and took Joseph to school in a squad car.

After Hashem lost his second job in California, he was unemployed for an extended time and eventually accepted employment at the United States Patent office. Hashem left for Virginia when Joseph was a sophomore. Because I was working as well, Joseph was alone much of the time and we became estranged. One afternoon the high school principal called me at work directing me to appear before the school hearing board due to Joseph's truancy and suspected drug use. Joseph denied drug use and provided a colorful explanation for missing school and was permitted to return to school, but his behavior did not improve. Joseph seemed very depressed and angry and we started to argue constantly, and he was retreating

emotionally. It got to the point that I believed the only thing I could do was to help him get through high school, and I had no energy to do anything else. And even this did not work out because Joseph was expelled from school early in his senior year due to an accumulation of disciplinary problems. He later took a state test and earned his diploma.

After Joseph left school I began to suspect he was using drugs because of his mood swings and isolation, and when I asked him, he vehemently denied it. Not long after that conversation Joseph was arrested for drunk driving when he crashed a family car early one morning and was taken to jail. Luckily no one was hurt, but he ended up being convicted. I felt extreme disappointment and I let Joseph know it.

After graduating high school Joseph was consistently employed, and usually worked in restaurants, waiting tables and doing kitchen prep. He also enrolled at a local community college and started taking classes. One afternoon I heard Joseph speaking on the phone in Spanish, a language he apparently had learned from Mexican workers in the kitchen at Angelo's restaurant. Joseph became good friends with a few of his Mexican co-workers, and they often invited him to their family picnics on weekends. Joseph was trying to figure out where he belonged and felt a sense of family with his friends. When Angelo's closed, Joseph and two of his Mexican friends started a landscaping business and worked very hard. Even though Joseph was very optimistic about this endeavor, his father was extremely displeased and believed it was a waste of time. To Hashem, anything less than a degree in engineering or medicine was a failure. Regardless, Joseph began to dress and behave in a way that was heavily influenced by his Mexican friends, and this seemed to validate him immensely. His friends also treated him with respect and helped him work on a car he recently purchased. It was probably Joseph's first peer group since we had left Pennsylvania.

Even though I was happy he had friends, I was very concerned that they were not a particularly good influence and I continued to have concerns about drug use. He lost a dramatic amount of weight and he appeared gaunt. He often seemed hungover or "out of it" in the morning, which was not typical, even if I didn't smell alcohol. He was sick often and would claim it was food poisoning. Although he never missed work, he seemed to be struggling in most other ways. I questioned him repeatedly about drug use, and he always denied it. I really did not know what to do and I was extremely anxious about my own life. Whether I rejoined Hashem in Virginia was up in the air. I felt disconnected from my son, and my daughters were

very far away. About the only stability I felt was from working as a pension fund analyst. Because it gave me a sense of security I wanted to continue and ultimately decided we would stay in California longer than intended.

Eventually, when Joseph was 22, Hashem and I decided to start making plans for us to move to Virginia and Joseph declined. He said he would register again for college and take classes. As this was happening I developed significant health problems that made me miss work and pushed me to the brink of an emotional collapse. Eventually, I decided to leave California to preserve my health and decided to leave him there to figure his life out. I know now he was in deep drug addiction. Before I moved I told Joseph he needed to get his life on track that I couldn't take it anymore. When I left California I declined Joseph's offer to drive me to the airport. I admit that I was so disgusted and angry at Joseph and felt like he was responsible for all my heartache. I didn't want to be around him and I let him know how big a disappointment he had been to me. I know it really hurt his feelings when this happened. For the next two years I had limited contact with Joseph and I continued to suspect that he was using drugs.

In 2012, Joseph moved to Virginia, lived in our basement in Stafford, and enrolled at the Northern Virginia Community College. He promptly found work and told us he did not intend to be a financial burden. He worked at a variety of jobs over the next years, but did not do well in school, which made Hashem and I express more disappointment. When Joseph failed to complete his courses, the tension in the home reached a breaking point and Hashem told him he had to move out. Hashem also told him there would be no more assistance forthcoming until Joseph re-enrolled and was working toward a degree.

For the first months he was back living with us, Joseph showed some improvements in his behavior and attitude, but by the time he left our home, he had again retreated to the withdrawn, moody, and often angry young man I had left in California so I suspected he had started using drugs again. After leaving our house, Joseph rented a room from a professor from Somalia, and he was surrounded by Muslim immigrants we never met. Joseph began practicing Islam and gradually Hashem and I perceived changes in his behavior as he became more communicative and respectful. For the first time Joseph began praying 5 times a day, fasting during Ramadan, and he quit smoking. Joseph also enrolled in A certified nursing program and said he wanted a better job and a career. Joseph was very proud when he showed us his academic excellence certificate at graduation. His teacher told Joseph

she was going to take a chance on him and helped him get a job at Virginia Hospital Center in the same day surgical department. He interviewed and got the job which included a drug screen that he passed showing that he had stopped using drugs, which gave me great relief.

On the cusp of all these positive changes, Joseph came to his father and I in mid-2015, and abruptly announced he was getting married. This decision seemed incredibly impulsive and poorly thought out and we discouraged him and told him he needed to finish college and get a job first before he was ready to support a family. Joseph would hear none of it and cited Islamic web sites supporting the notion that young Muslims should get married while both attending college. Because we knew Joseph was going forward whether we supported him or not, we acquiesced in this and met his future wife, Saba Cheema, her mother, and her sister. Despite our reservations, Joseph seemed very happy and he and his now wife would come over for dinner on weekends. They were both working and appeared to get along well. Joseph seemed to adore Saba. Joseph began to encourage me to read about Islam. I already knew quite a bit through course work or having read the lessons my daughters learned in Sunday school.

As Joseph was becoming more devout, he would talk to us about religion, leave us with religious literature, explaining the importance of the rituals like praying 5 times a day and fasting, and encourage us to follow cleanliness and diet restrictions. Joseph disagreed with his father about certain religious practices and these disagreements would lead to heated arguments. Joseph spoke to us about what was happening to the women and children in Syria and it was clear that it really upset him. He said he wanted us to donate money to help them get food and supplies.

Late in 2015, we learned Saba was pregnant. They seemed very happy but soon after Joseph announced he was going to Saudi Arabia to study the Quran. This was odd but Joseph said he would be back well before Saba gave birth. Within a couple of months, Joseph was arrested at the airport, we were overwhelmed with shock and grief. I remembered years after moving to California driving past that first one bed room apartment with Joseph and, in a rare emotional expression he told me he had felt so lost, sad and depressed when we moved away from Pennsylvania. At that moment I felt I had failed Joseph so long ago when I became very depressed about leaving our home and moving to California. Joseph was a teenage boy who had to deal with the loss of his friends, his sisters, and his support system just like

me. I did not have the internal resources to help him feel ok about the move and his father leaving. I feel he turned to drugs and ultimately religion to take away his pain and they grabbed his inner soul.

Since he has been in jail, Joseph has written us the most heartfelt letters. He has apologized for his crime and his behavior growing up. He acknowledged his horrific mistake and how he has hurt Saba and our family. He said he is sorry for everything he put us through now and in California. He said he is so blessed to have our support. He is thankful for everything we are doing for him and keeping close to Saba. We talk to him by phone every night and visit him two days a week. We are not able to talk about the case but Joseph told me he is always thinking about Saba and his soon to be born baby boy. I know this baby will have an engaged father and mother and break the pattern. Underneath it all Joseph is a wonderful, intelligent, kind and caring man. I believe Joseph realizes how dear Saba and his baby are to him. He writes about our family being closer and spending more time together. He took a wrong turn without the right guidance and the byproduct of an untreated addiction.

Your honor, Joseph needs rehabilitation for his unresolved issues. I know that he regrets his decisions and appreciates that trying to join ISIS reflects a twisted interpretation of the Quran. He is on the right path, partly because of his arrest, and if given a second chance I know he will become the good man he is in his heart, and a law-abiding citizen. I pray you give him that second chance.

Respectfully,

*Donna Farrokh*

Donna Farrokh  
Joseph Farrokh's Mother  
707-853-3848

# **EXHIBIT H**

Dear Honorable Judge Trenga:

My name is Hashem Farrokh and I am Joseph's father. I moved to the United States from Iran in 1967 to attend college and graduated with advanced degree in Electrical Engineering. After completing of my education I married and became a United State citizen. I decided to stay in this country always believing that there is more opportunity for my family specially for my children's education. I am grateful for the life that becoming an American citizen and love this country deeply. If I had remained in Iran I know I would not have had the same opportunities. I am thankful for this.

My son Joseph spent the first thirteen years of his life living with our entire family in Schnecksville Pennsylvania, a suburb of Allentown. Growing up Joseph liked to play with other kids from our neighborhood, some of his closer friends were John, Sean, and Nigel. At an early age Joseph showed an interest in playing golf, I assume it was because he knew that I played, so I signed him up for lessons at a nearby golf courses. After playing for awhile, Joseph lost interest and said did not want to do it anymore. He showed a similar interest in marshal arts awhile later, so we signed him up for karate classes but he again lost interest, and this seemed to begin a pattern. Looking back now I see that maybe what he really wanted was to spend time with me and have shared interests. I was not really raised that way and did not appreciate that was what he was doing. In Iran, a father's role is to provide for his family and to try to insure their children's academic and professional success. We do no hug and say "I love you." In m culture, fathers show their love by making good living and providing a good home. This is one of the early differences between Joseph and his classmates.

During his first eight years of school, Joseph received good grades and seemed to show academic promise. He appeared to be quite smart in comprehending school work and completing assignments. When Joseph was in the seventh grade I accepted a position with a start-up company and moved to Northern California, and after Joseph finished school that year, he and my wife Donna joined me there. We lived for one year in a tiny apartment in a rough area near Richmond, California. Joseph and his mother were very unhappy with the move because we went from a large comfortable home in Pennsylvania to a small apartment in California. Later we leased a townhouse and then eventually purchased a home. However, that did not change relation between us much. Donna and I were in arguing often about different things. Joseph were staying up almost all nights and sleeping all days. He was missing a lot of classes in school. When I confront him with his behavior and told him he cannot stay-up all night and sleep of the day, he became very frustrated with me and we would argue. We tried to get help by consulting with psychologist and having him attend counseling. Forcing Joseph to receive psychological counseling caused immense conflict and we had arguments and it seemed to make Joseph even more unhappy and eventually we stopped making him go. I see now that Joseph was hurting badly about having to move way from a happy life and his friends and by making him see a psychologist was like telling him he was a problem.

In early 2001, when Joseph was 13, my employer went out of business and I lost my

job. This created a lot more stress in our family and I threw myself into finding a new job. I managed to get a position with a second start up company which was seventy miles away from location of my resident. The job demanded spending long hours at work often including Saturdays, which kept me away from home. In late 2002, the second company could not raise sufficient fund to continue its operation. They closed the company and I again got laid off. After losing that job I tried for nine months to get a job that was reasonably close, but because of the economy there was no place that would hire me. Eventually I expanded my job search to the entire country and in 2003 I accepted a position in United State Patent and Trade Mark Office (USPTO) in Virginia that I am working for ever since. However, Donna and Joseph did not want to move, stayed in California. At the time I accepted the new position, we had planned that Joseph and Donna would join me soon. Joseph was fifteen when I left California. From that point until Donna moved to Virginia in 2010, I would see him only about twice per year and occasionally speak with him by phone.

After I left California, I learned Joseph started smoking, and Donna suspected he may have been drinking alcohol as well. These are forbidden in Islam. I have been a practicing Muslim my entire life and very moderate in my views. I raised my children in the Muslim faith, but did not require them to observe all the tenants of my faith but I did demand that they live clean and spiritual lives. When I suspected Joseph was drinking and smoking I asked him about it and he vehemently denied it. When he denied it I made clear that these things were sinful. Donna also informed me that Joseph had taken on a new group of friends who were very different than those he had had when he was a child and we were concerned that he was getting into trouble because of it. Even though Joseph had been a good student previously, he received bad grades at Benicia High School and got into a lot of trouble there. We learned that he was skipping school a lot, was disrespectful to authority, and creating problems. In his junior year he failed many of his courses and had to take summer school. At the beginning of his senior year he was expelled.

In the two years that I had been away from Joseph, he seemed to have become a different person. Although he had always been a little headstrong he had always been a polite and respectful boy growing up, he studied and got good grades. After I left California, though, he seemed to struggle and be angry at his mother and me all of the time. I tried speaking to him over the phone, but it wasn't the same. Donna was exhausted and overwhelmed and I thought Joseph would eventually get better but it really didn't. He just began to hide his problems more to keep secrets and avoid conflicts.

After getting expelled, Joseph received a high school diploma after passing state test, and started some courses in Diablo Community College in Northern California. One of the courses he took was algebra. While he was taking the algebra, he frequently called me to ask questions and we sometime also discussed the value of education and importance having a degree. He also took a philosophy class in Diablo College, which included comparative of modern religions. I remember him telling me about similarity among the religions. I think this was the first time he showed interest in faith and

religion. However, at the beginning he did very well in courses and completed the courses. After that, he took some courses that he did not complete and then he quit the college all together.

While working for USPTO in Virginia, I was able to go to California a few times a year. I noticed the same Joseph behavior, staying up all night and sleeping most of day. I knew there was problem with his behavior but I could not understand what caused that. When he wasn't sleeping, Joseph tended to be irritable and moody. He did not introduce us to his friends and kept his personal life secret from Donna and I. We began to suspect that he might be using drugs but we did not confront him because we preferred to avoid conflict.

In 2010, when Joseph was 23, Donna moved to Virginia and Joseph decided to stay in California. He got his own apartment, working, and re-enrolled in school. In 2012, we helped Joseph move to Virginia and he lived with us. However, there was no change his behavior. He continued with same sleeping pattern, being moody and distant, and took some courses in Northern Virginia Community College. However, he again quit going to college. After a year or so, I invited Joseph to go to the Mosque for Friday Prayer with me, he agreed and we went to the Mosque couple of times together. It was at this time that Donna again brought up the fact that she suspected Joseph was using drugs. After hearing that I felt that drug might be reason for his change in behavior. When we discussed this I got really upset but felt helpless. Our relationship with Joseph was very strained and in many ways, I was just getting to know him again. Based on my prior experience I did not believe he would be receptive to us talking to him about drug use and he would deny it and refuse treatment. When I eventually did ask him he denied it and got real angry. I told him I have not seen you using drug but if you using drug we are here to help you. I told him using drug will hurt you and people closed to you. I asked him try not to do it and put your trust in god and ask god to help you.

Not long after I confronted Joseph his behavior seemed to start to change. He started to become more respectful to Donna and I, he started going to mosque regularly for Friday prayers, and he became more knowledgeable about Islam. I really appreciated the changes in him and for the first time I really praised him. After that we started discussing the religion more often and Joseph expressed strong feelings about suffering of people specially children in Syria. He often asked me to support financially by giving money to charity that help the children in Syria. He was against all the bloodshed in Syria and expressed strong opposition to the Syrian government. When Joseph expressed this to me I praised him for becoming more aware of our religion and for caring about Muslims who were suffering. I certainly did not intend to reinforce extremist views. Over the next few months our conversations about faith became increasingly tense with Joseph showing anger and telling his mother and I that we were not living consistent with Islamic teachings. We had many arguments and we attempted to placate Joseph believing that the intensity of his views only reflected his recent conversion. We never met his friend Mohammed Elhassan and we never really suspected that he sympathized with ISIS. If we had, we would have condemned them and what they were doing.

Since Joseph's arrest, I have felt deep sadness and depression about what he did and for the fact that I had not been more present in his life. I don't fully understand what caused him to be so radicalized to point that he would try to join ISIS. As a father, I regret that because of my job I was not able to be with him during the critical time that he needed the most. I regret not appreciating the pain he was feeling about the many changes that he was subjected to in such a short time as a child. I never appreciated that he would feel so lost and disconnected. I would never suspected that he would ever use drugs. Despite his crime, my son is a very good person. He was misguided in his crime, but I believe that his interest arose from a humanitarian concern for dying children and innocent people, and that one of the effects of his addiction would push him into extreme thinking. I am thankful that he was arrested before he hurt anybody. More than anything, he needs proper rehabilitation.

Joseph has always been a good worker and I know that he is intelligent and can be a law-abiding citizen. He has a kind heart and a good brain. He was recently married and he and his wife are expecting a baby boy at the end of July. His wife and son really need him to take care of them. I know my son is deeply remorseful for what he did, and that he is ashamed and regretful. I believe his conversion was sincere and that he will follow his faith and devote the rest of his life to doing good. With drug treatment and counseling, Joseph will overcome his problems. Your honor one of the many great things about this country (my adapted country) is that it believes in everyone's potential and is willing to give a second chance when a person runs afoul of the law and atones for what they did. My son has done everything that has been asked of him and will continue to do so to help our government. He is reforming himself and will keep doing that. I would respectfully ask you to give my son also a second chance.

Sincerely,

Joseph's father

  
Hashem Farrokh

# **EXHIBIT I**

Jaleh Skeath  
1233 W. Broad Street  
Emmaus, PA 18049

July 6, 2016

Dear Judge Trenga:

I am writing this letter on behalf of my brother, Joseph Farrokh. The circumstances in which my brother finds himself have caused my family great sadness and grief, and not a day goes by that I don't think about my brother and wonder how everything got to this point, how my sweet, adorable and loving baby brother could have become so lost and confused as to make such a bad decision. We love America and reject violent extremism. I've had much time to consider things and look back on the circumstances of his life, which in many ways were very different from my circumstances as the oldest daughter, 12 years older than Joseph. I love my brother so very much, and still find it so hard to believe that this has happened. The sadness is there daily.

From my view, Joseph's early childhood was stable. Joseph and my parents, sister and I lived in a suburban, middle class neighborhood. Joseph always had playmates from the time he was young. As a toddler/little boy, he played with another American boy in the neighborhood who was his age. When Joseph was a pre-teen, I observed him to have many friends. He seemed happy and often had his friends over to the house to play, or he would go to his friends' homes or on other outings. There were always phone calls coming in for "Joe". I was also aware that he had a girlfriend; which was somewhat surprising as my sister and I were not allowed to date; however, things seemed more lax when it came to what my brother was allowed to do, perhaps because he was so much younger than my sister and I, or perhaps because he was a boy. His girlfriend even visited him at our house. I know he really liked her, and she him. Joseph seemed well adjusted, and happy in his world.

My parents did have arguments which often centered around religion. At that time, Joseph wanted nothing to do with the Islamic faith. All three of us kids went to Moslem Sunday school, however, Joseph seemed to resist it the most. At one point, he refused to go, and this made my father very upset. We also celebrated Christian and American holidays; Christmas, Easter, Thanksgiving. It seemed that Joseph wanted to fit into the American culture as much as possible. And his closest friends were Christian Americans, not Muslim. This seemed to disappoint my father a lot. He wanted my brother to go to Muslim Sunday School, and to be more involved in the Islamic faith, but Joseph would argue against it. There were times when my father would say that we were not following the religion as we should be, i.e., not praying, fasting, going to Sunday School, etc. etc. All of us kids felt somewhat different than our Christian friends, as there were some things our father did not want us to do, such as going to school

dances, dating, etc. I think Joseph felt somewhat embarrassed by his Iranian/Muslim heritage, as well his middle and last names. We just wanted to fit in as much as possible.

Still, Joseph had his own world of friends, sports and outings. I think he was able to weather our father's disappointment because he had the approval of his friends and social support. At home, he and my sister and I got along well. Of course, because of the large age difference, I especially may have taken on a more mothering role with Joseph. He was a sweet and happy little boy, and we enjoyed having our little brother in our world. We had fun and laughed together, and things seemed like any other normal family. We also took fun family vacations, often with my Aunt and Uncle and cousins. We went to the Outer Banks and St. Louis. We had a lot of fun swimming, boogie boarding and collecting shells. We always took Joseph under our wings, he was our little brother and little cousin. We loved to see him laugh and have fun.

When Joseph moved to California as a result of my father's job loss, it was very difficult for all of us, especially Joseph. By then I had already graduated from college. My sister was in college. The two of us girls stayed behind, as we were in our early 20's and had our own lives going on in PA. I know that my brother and mother became extremely depressed when they first moved to CA. I remember how sad they both seemed before moving. My brother had to leave behind all of his friends, girlfriend (possibly first love), and go to a completely unknown place where my parents knew nobody. My mother would call when they first got there, and she sounded extremely lonely and depressed. I know it was very hard for my brother. I remember my mom telling me Joseph once ran out of the house, and she had to go looking for him and found him hours later roaming the streets. I think Joseph's world and sense of peace was shattered, all of his friends, girlfriend, and older sisters were no longer a part of his daily life. He had a hard time fitting in and really lost his way.

When I would visit CA, he and I would spend time together and, I felt, reconnect. I could tell he was struggling, but our visits were a respite for him and we had fun. A couple years after the move, though, things began to change. Looking back now, I think this was when he first started using drugs and alcohol because the easy-going sweet boy was gradually replaced by an angry and disengaged teenager. And this only got worse after my father relocated to Virginia, leaving Joseph and my mother behind. My mom was also working full time, and my brother was left on his own all of the time. He lacked positive guidance during those years of his life. My father was not there for my brother, and he fell into the wrong crowd – a group of rough kids who he was ashamed to bring home. He started dressing differently, I think he was mimicking some of his buddies. He would wear long chains with crosses on them, and he even seemed to speak with a sort of Spanish accent. When I would visit he would sleep all day and be up all night. He was withdrawn and isolated, and didn't want to go and do anything with me like he did before. I told my mom this wasn't normal behavior and I sensed something was wrong.

This pattern seemed to continue for many years. My mother had a lot of difficulty with Joseph at this time. She was at her wits end with him, and she would often be upset when she spoke with me on the phone. She would say that Joseph would yell at her, and she was also frustrated with the fact that my father was living so far way in VA, and though he was supporting Joseph financially, there wasn't much of an emotional connection between the two of them. My mother told me the story of having to call a truancy officer out to the house because my brother refused to go to school. I believe he was often truant, and because my mother was at work, she provided no supervision. She was like a single working mother dealing with a teenage son overwhelmed with anger and confusion. She didn't know what to do.

When I would see my brother there was often conflict. He would argue with my mother, and if I would call him out on it, he would become angry with me. We all tried to talk to him to see what was going on, but he wouldn't confide in us. I don't think my father stepped in to help him as he should have, and my brother continued to struggle with finding his way. We all suspected he was using drugs, but if confronted he always denied it.

Joseph really struggled with his identity. He would seem to try on different cultures, Mexican, Italian; looking for a place to fit in. Looking back, I feel badly that I wasn't there for him more. From the time he moved to California with my parents, Joseph was like an only child, but without the necessary support to prosper. He didn't have a sibling to really connect to, and he seemed to turn to his friends for validation. I don't think those friends were the best influences for him. This pattern continued for many years, with my brother and mother at odds. I later became aware that he had a DUI, a couple arrests, and all kinds of problems in school, which was odd because Joseph was a very good student before moving to California. I knew he ended up being expelled from high school.

A few years after Joseph received his diploma, my mother decided to move to Virginia to be with my father. A big part of that decision was a sense that the relationship with Joseph had become toxic and she felt helpless about what to do. The two of them had an enmeshed, codependent relationship that put a strain on both of them. My mother tried to set boundaries that she wouldn't enforce – and lacked a husband to support her – and grew frustrated with Joseph when he did not respect what she said. I know that Joseph heard a lot of harsh words about himself during those years. Joseph seemed angry toward our mother, and took out his frustration by constantly challenging the authority and rejecting the limitations she tried to place on him. She was angry and exasperated and depressed. He was frustrated, angry, and withdrawn. They both struggled constantly without any way to make things better.

Finally, when my mom was on the brink of having an emotional break, she moved to Virginia and Joseph stayed behind. We hoped that it would be a good break

for both of them, and that Joseph would figure things out, but things got worse. Joseph struggled in school which was a big disappointment to my father, who valued college above all else for us kids. That was really the only thing he could focus on when he spoke to Joseph. Because of his drug use and personal issues, I don't believe Joseph was able to attend to his studies, and again his schooling ended. Eventually my parents decided that it would be best if he moved to Virginia to be with them, and to attend school in Virginia. I spoke to my mother when she was in California to help him move and she told me that he needed to "detox" from drugs and was very sick. This experience just confirmed what we had all suspected – that Joseph was a drug addict. Although he apparently stopped using drugs, he never received drug treatment or rehabilitation.

For awhile after moving to Virginia, Joseph seemed like himself again. When I would visit and spend time with him he fully participated in family activities, like playing board games, going to the mall, family conversations, Scrabble tournaments, and playing "Songpop" on the Ipad. I remember once at the mall, we kept putting quarters into a candy machine, and my brother had handfuls of "runt" that he kept eating. They were falling out of his pockets and the three of us couldn't stop laughing. He was affectionate and loving with my daughter and just seemed to enjoy being around the family. We had fun together, and it seemed that maybe things were straightening out for him at last.

This didn't last and it appeared he resumed using drugs within months of relocating. I could tell by his demeanor and attitude because he retreated, was grumpy and seemed to avoid the family. When I would visit he would literally "run out" of the house and not tell anyone where he was going, and would get angry when we asked him. His eyes looked very bloodshot to me, and when I tried to confront him on it, he would become very angry and yell at me saying I didn't know what I was talking about. He wouldn't go out with us or do the things he used to do with us. I could hear him awake late at night, and he would sleep all day, except when he had to go to work. My brother did always keep his employment, even during his drug use, and sometimes it seemed to be the only thing he cared about. He worked at the mall in VA, and was adamant about showing up for work, and wouldn't want to miss work.

During this time, my cousin died of a drug overdose. My family was convinced Joseph was doing drugs and finally we decided we weren't going to pretend it wasn't happening. I decided to confront him. I told him on the phone that I was worried for him, and didn't want to see anything happen as it did with my cousin. I know my parents offered him rehabilitation, anything he needed, they would have done that for him. He would never admit it to any of us. A short while after we confronted Joseph about his drug use, he started to follow Islam very seriously. I believe that's what he attributes to getting him off of drugs. At first, we were all happy for the change. He was off of drugs, and that was a good thing. However, he soon became too fundamental about the religion, in all of my family's view. My father, who practiced Islam his entire

life, even told my brother that he was going about his religion in the wrong way. Joseph would become argumentative with all of us, insisting that we all needed to follow Islam, and that we shouldn't be celebrating Christmas, etc. Of course, there were many arguments between him, my parents, and when I would visit there were arguments between the two of us. Joseph couldn't seem to see anybody else's point of view, he seemed singularly focused on the fundamentals of Islam, and to me, he almost seemed obsessed or as if he was in some sort of a cult. My sister and I had grown up going to Sunday School, so we told him we didn't need him to be preaching the religion to us, but he would continue to dole out his 'advice' though much of it made little sense to us. We couldn't come to a common ground.

When the conflicts became unbearable, my father told Joseph he had to move out and he moved in with some other Muslim men. It was concerning that he would not tell any of us his address or let us meet them, or see where he was living. Joseph started sending texts to me and my sister with long ramblings from the Quran or other Islamic sources. I couldn't even understand what some of them meant. It was clear he was very engrossed even if he didn't fully understand the writings either. He grew a long beard and dressed more conservatively. Still, I figured at least he was off of drugs.

My brother was always very kind and considerate to his nieces, even during this time. He loved all the girls, and would bring gifts for them. He laughed and smiled at them, and said he hoped to have his own kids one day. That was one thing he always demonstrated, even when he seemed so angry at everyone else, he was always very sweet to his nieces.

In mid-2015, I learned from my parents that he was planning to marry an acquaintance he met at a job he held in the mall. It seemed the whole marriage was shrouded in secrecy and neither my sister Sara or I were allowed to meet her until the weekend of the wedding. It all happened so quickly just like his complete emersion into radical Islam, and his now marriage to this young Pakistani girl who we didn't even know. My parents tried to tell my brother this wasn't the best time for him to be getting married, but my brother ignored their entreaties and pressed forward.

All of this was very concerning. In less than a year Joseph had converted to Islam, had radically changed his dress and manner and the way he talked, and was getting married. It seemed so completely out of character. He had only stopped using drugs a short time before all of this happened. Now he was marrying this girl it seemed like he hardly knew. It all seemed so strange to me, and extremely impulsive and poorly thought out. But I wasn't in a position to stop the marriage, and I was told as much by my parents. Consequently, I supported my brother in this marriage and brought my family to Virginia for the wedding. When we arrived Joseph showered my daughters with gifts and attention. He was always very generous and kind to the girls.

Even so, my conversations with Joseph were strained and always turned into an

argument over religion. He would question my faith and beliefs, even if I made clear I didn't want to discuss religion. It just seemed like we couldn't talk about anything except Islam, and there was no finding common ground with him. It was very difficult for all of us. At his wedding, some of the guests expressed that they were surprised that my family wasn't more conservative, compared to Joseph. He was acting very religious and serious, and this was different than the rest of the family. My husband, who was sitting on the men's side, overheard someone say this same sentiment to my dad, who replied, "He didn't get this from me."

After Joseph got married, things continued this way. He would send me these texts, which I would mostly delete or try to challenge to no avail. Still, my brother would send nice gifts to me and my husband and the kids for Eid. He sent my husband, James, a vintage Dan Marino Jersey, as he knew how much he liked the Dolphins. He followed up with me asking if James liked the Jersey. These were the "normal" things he still did. He was very generous with all of us. He would bring my mother expensive gifts. I know he gave my sister a Michael Kors watch. I know he cared and loved us very much. He would say that he loved us a lot more than previously. He and his wife visited my parents often for dinner. He sent me pictures of my dad wearing a new hat he and Saba bought for my dad. That was the last text I received from him before he was arrested. I never had any idea that any of these things were going on. Saba was pregnant, and Joseph seemed happy.

Despite Joseph's recent conversion and even more recent radicalization, he is an amazingly kind, intelligent and loving person. He never hurt any of his family members, and I find it so hard to believe he would have been capable of hurting anyone even if his attempt to go to Syria had succeeded. I read about another young man in Virginia who was recently captured by the Kurds after traveling abroad. I think if Joseph had succeeded, he would have quickly grown disillusioned and found a way to get back to his family. I know he was so depressed and lost, and I think he just wanted to run away and was brainwashed by this radical group of people. I am just glad he was arrested before he could get there. My family did not grow up with radical Islam. My father is a very quiet and peaceful person. He came to America and wanted a good life for his family. He brought us up with kindness, and told us to love all people, even if they had different values. My brother was always kind to everyone, no matter their race or religion. My brother's emersion into radical Islam seems to have more to do with his own personal identify crisis, need for belonging, trying to gain my father's approval, and a failure to address his drug addiction and other personal problems. I think it is only partially caused by religious devotion. The most recent convert is always the biggest zealot.

Everyone who meets my brother likes him, and I believe he could have had a very bright future, if he had the proper guidance and support that he was lacking. I think he struggled for years with his identity, he was alone without his family, his world was torn apart. My father was not the most engaged, and I think he was missing the

father figure he sorely needed. The age gap between my sisters and him was difficult, because we didn't have the sibling relationship that we might have if were closer in age. More than anything, I think Joseph's spirit was harmed when my parents uprooted his life in Pennsylvania and failed to replace that support in California. I believe the drugs played a big part in my brother's struggles. He went from drug use to Islam, with no in between and he needs rehabilitation to deal with his issues and substance abuse. Joseph will be a positive member of society regardless of the outcome of this case. He has always been able to hold down jobs, and he has been a reliable employee. What he needs are insights into himself, supportive treatment, and rehabilitation. With therapy and rehabilitation, he will overcome his problems and become a model American citizen. One thing you can be sure of is that Joseph has a family that loves and supports him and will always do so. We know we are not responsible for his bad choices but we also believe that we can help him correct his problems by supporting and loving him.

Joseph has a son on the way. His wife is such a kind and peaceful person. She deserves to have a healthy husband and father for her baby. I know he has made bad choices and mistakes. Joseph was a "lost soul" for some time. He needs help, not punishment, and I hope and pray that he can finally get the help that he needs. The circumstances of his adolescence and teen years played the biggest part of leading him down this path. He was never able to deal with these unresolved issues. I hope he will be able to have a second chance to turn his life around. I know in my heart he is truly sorry for this choice, and that he wants to be a good husband, father, brother and son. I ask you to please consider making this possible for him.

Thank you so much for your time and consideration,

Sincerely,



Jaleh Skeath

# **EXHIBIT J**

July 5, 2016

Hon. Anthony J. Trenga  
United States District Court  
For the Eastern District of Virginia  
401 Courthouse Square  
Alexandria, Virginia 22314

Dear Judge Trenga:

My brother Joseph Farrokh was born when I was about 9 years old. He was a cute little baby brother to me. Through the years, there was the normalcies of family life; school, family dinners, and mosque. We were fitting in just like all the other families. My brother was in school, he had his friends, played lacrosse and had a family that loves him. When he was young he was a very normal kid. Very respectful, polite and well-mannered. When he played sports he demonstrated athletic ability and good sportsmanship. He had academic potential and received good grades. He seemed like a well-rounded, gentle child.

As I was so much older than Joseph, when he was still a young adolescent I went off to college and lived out of the home. My brother continued to play sports, have lots of friends, and maybe even a girlfriend. When my father took a job in California and my mother and father were going to move the family from Pennsylvania, my little brother was understandably distraught, as any young 12 year old would be. He acted out a bit. My mother was now alone with Joseph in Allentown. My father left first, while my mother stayed behind with Joseph to sell the house.

My older sister, Jaleh, and I stayed back in Pennsylvania after the rest of our family moved. I was in college and we both had jobs and had started our adult lives. Because we were close in age, my sister and I were close growing up and after we moved out of on our own. We even shared an apartment together at the time my parents and brother moved to California. Initially, the transition was very hard on my parents and Joseph, and he seemed to be sad or depressed. The family dynamic had changed dramatically for him, and equally important, he lost his friends and his peer group. I could tell he was unhappy. About a year after my parents moved to CA and bought a house, my mother found a job to help financially. During those first years, most of the interactions that I had with my family was through telephone calls. In those first few years it seemed that Joseph was starting to make his way and was doing okay in school. When I came to visit, we had family game nights and enjoyed each other's company. We had silly jokes making fun of our childhood friends. We had silly nick names for each other that might offend someone that didn't know the inside joke. We changed the words of songs to tease each other and fun. It was nice to see my parents and my kid brother again.

After a couple of years my father suddenly lost his job. This sent him, my mother, and Joseph into disarray. My father immediately began applying for jobs and interviewing all over the country. Eventually, my dad was offered a job in Northern Virginia for the US Government working for the Patent Office. Because providing for his family is a big part of who my father is, he never considered remaining unemployed to find a job in CA. My father, of course, accepted the job in Virginia. I recall general discussion that my mother and brother would eventually rejoin him in Virginia. I believe Joseph was 15

at the time, and contrary to the general plan, he and my mom did not rejoin my father promptly, but ended up living in California for many more years – about seven for my mother and nine for Joseph.

After my dad's departure Joseph started to have problems at school. He and my mother were living alone together and my mother continued to work full-time. Joseph had always been bright and a good student, but soon his grades started to suffer, he started skipping school, and he started having conflicts with other students and the school administration. I remember both my mother and father saying that Joseph was not working up to his potential. At the beginning of his senior year in high school, he was thrown out because of an accumulation of problems. Although we knew he had some problems, being expelled caught us by surprise. Looking back now, it seems that it should have been a big red flag but there was no intervention. Instead, Joseph applied and passed California's State Board of Education's high school equivalency test. When he received his certificate of proficiency, which is the same as a diploma in California, his expulsion was kind of forgotten.

In the intervening years, I had moved to Arizona with my fiancée. After we were there a few years, Joseph started coming to visit. During those visits he seemed like the same old Joseph, and we would spend time doing outdoor activities, like hiking, seeing the sights, hanging out, joking around, and exploring my new home. When he came to visit I enjoyed his company and appreciated that he was becoming an adult as well as relating to him away from our parents.

Never one to be the most outgoing, in his late teens and early twenties I noticed that Joseph started to become secretive and a bit isolated. Maybe a better way to say that is that he started to isolate himself. For example, he started keeping to himself most of the time when we would go to visit. He would forego group activities, like playing board games, if he had a choice. When he would join us for group activities he would keep to himself, put on headphones, or leave early.

I noticed that Joseph also was becoming less open about himself and what was happening in his life. Again, not that we ever would sit down for marathon sessions to discuss our life plans, but he was clearly less forthcoming. My mother also told me that she and my brother were arguing a lot and often she would call me very upset. She told me that she had concerns about what he was doing, but he refused to tell her, and he would often ignore her when she asked him where he had been. She told me that he kept his whereabouts a secret from her, and would not answer her questions when she asked where he had been. The possibility that Joseph was using drugs had come up, but he always denied it.

My parents had wanted each of their children to attend to college, and Joseph had showed academic promise when he was younger. But after getting expelled from school and not applying to college, my parents made it clear he was disappointing them. I believe that letting them down really was hard for my brother. On top of that he was hanging out with a concerning group of people, according to my mom; drinking, and having other problems. Once, he crashed his car and was cited for driving drunk. He had no explanation for the accident. These experiences caused the conflicts between my mother and Joseph to escalate, and they seemed to be fighting all the time. Most of what I learned came from my mother and she seemed to be constantly distraught. My mother claimed she wanted Joseph out of the house, but then would not take action to make that happen. She would express great frustration with Joseph's behavior, but then would feel guilty and start pestering him again. This back and forth went on for a long time. From my mother's perspective, Joseph had an immense amount of anger toward her that she believed was unfounded.

When my brother took a job as a landscaper, he was working with Mexican immigrants, who became his primary peer group, and he drifted away from the friends he had previously. In relating to his new friends, Joseph seemed to take on their habits and values. He started speaking Spanish, and emphasizing family and tradition. According to my mother, when his new friends came to the house they were very respectful, and Joseph seemed to follow their lead. Around this time, Joseph started staying away from my mother's home without telling her where he was. This upset my mother, but she was most bothered by the fact that he was keeping his life secret from her. After living away from my mother for a period of time, Joseph moved back in and the fights between the two of them began again and intensified. Because of Joseph's secretive and erratic behavior, my mother, who was around Joseph the most, would ask Joseph about drug use, but, he would deny it and become very angry.

In 2010, my mother finally rejoined my father in Virginia, leaving Joseph in California renting a small apartment. By this time Joseph had enrolled in a community college and was working full time. After my mother moved east, my husband and I also relocated to Virginia, and we had to live with my parents for a short time. Soon after moving in I began to recall my own youth and how unhappy I had been. My mother and I were constantly butting heads and she openly expressed her displeasure with my life choices. My husband and I had financial problems, and my mother made it clear that she was disappointed in me. We moved out as quickly as possible.

Around the time I was moving out in 2012, my mother went to California to help my brother prepare to move to Virginia. In the process she apparently received some confirmation about his drug use because there was family discussion of the possibility that he might be going through withdrawal. Joseph arrived soon after and moved into my parent's home. There was a period during which he seemed interested in family activities; we took a trip to the National Zoo with my daughter, he'd come to my house for dinner, we'd play board games and watch movies, we started talking more, and we went Christmas shopping. That seemed short lived, within a few weeks Joseph, again started to withdraw and isolate. He came over to my house less and when he did come he was withdrawn or he would spend a lot of his time sitting out in his car. Joseph's behavior was very odd but when I asked him what he was doing out in his car for so long, he would claim he was on the phone. He never told me who he was talking to. Eventually he stopped coming around altogether.

About a year later I learned Joseph started attending services at the Mosque and my parents said it was helping his spirituality because he seemed to be more at peace. He was calmer, kinder to my mother, accepting, and more respectful. However, something just did not seem right. If I talked to him he seemed to take on an air of superiority toward me and quiz me about my religious faith. He seemed to want to debate and show me how much he knew about Islam. These conversations were very tense and I felt judged by my brother, much like I felt judged by my mother. When Joseph learned I was having marital problems and planning to separate from my husband, his disapproval was really harsh. I literally could not have a conversation with Joseph that he didn't turn into a debate on religion and judgment of me for not sharing his views. If I tried to change the subject he would quickly turn the conversation back to religion and what he believed was the right way to practice religious faith. Because of the intensity of his newfound religious fervor, I decided to avoid him. This was in late 2014 or early 2015.

When my parents noticed I was leaving every time my brother would come over, they asked me why and I told them that I could not take his pestering. They did not seem to understand where I was coming from, even though they had a very similar relationship with him. Because I chose not to talk

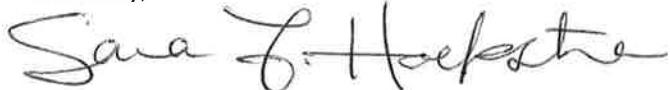
about religion with Joseph, nor did I want to hear stories about Joseph's new found religion, my parents accused me of being 'jealous' of him. Over time, as Joseph's views intensified, he became even more outspoken about religion so I would just retreat to my room when he was at my parent's house. Often when I would be on the bottom floor, where my room was, I would hear my parents arguing with Joseph. I could not make out what was being said, but I assumed to be about religion.

Soon I heard Joseph was engaged to be married to a woman I had never met and that August I attended his wedding. He had married a lovely, young woman who appeared very devoted to Joseph and her own family. After Joseph got married, he visits my parents less often but when he did their conversations often turned into religious arguments. A few months later, he was arrested and accused of trying to join ISIS in Syria. The last time I spoke with my brother before his arrest, he was visiting at my parent's house and he bought Girl Scout cookies from my daughter. We had a pleasant conversation and he was very loving with my daughter, as he always was. He had recently learned that he was becoming a father and he appeared very excited and proud. Because having children has changed me in such a profound way, I was looking forward to my brother's experience when his child was born. I was hopeful that he would see the new beautiful life that he created and it would smooth out some of his sharper edges.

I never imagined that my brother could get involved in supporting a horrible terrorist organization like ISIS. He was a very sweet and lovable kid growing up, but his life was uprooted when he was moved to California and he really struggled to find out where he belonged. Knowing my parents, I can see that he felt like a failure and he must have turned to drugs as some kind of escape. That's why he was so secretive and withdrawn. The speed by which he became radicalized tells me that maybe, he was trying to fill the same emotional void that he previously used drugs to fill.

I love my brother dearly and know that he is a good man and will be a good father and husband despite his crime. He has the intelligence, worth ethic, and good heart to overcome his addictions and to get the help he needs. I ask the court to take mercy and whatever action it can to insure Joseph gets drug treatment and counseling to treat his problems. Everyone in his family loves and supports him, and we will continue to do that no matter the outcome.

Sincerely,



Sara F. (Farrokh) Hoekstra

# **EXHIBIT K**

July 5, 2016

Dear Judge Trenga:

I met Joseph at work nearly three years ago when we were both working at the mall. When I met him I liked him immediately because he was very personable and sincere, and that is what drew me to him. He was very kind to me and made me feel so happy to be around him. We became friends and Joseph always treated me with the utmost respect. After we got to know each other better, we formed a relationship and started talking about our future. We were drawn together by our shared faith and love of family.

After Joseph met my mother he asked her for my hand in marriage. While my mother is very soft spoken and timid, she firmly holds to her beliefs, values, and intuition. I was not expecting my mother to blindly accept Joseph's request, and was willing to hear and accept any concerns of hers. To my surprise, my mother was so very pleased and happy with Joseph. She thought he was a strong, stable influence who placed a priority on family. The one concern that she did raise was Joseph's job at the time he met her. He was working at a kiosk in the mall and she did not think that was sufficient enough to provide and care for a family. I shared my mother's concern with Joseph and soon after applied and got a job at Virginia Hospital in Arlington, Virginia. This showed me that he was very committed to me and my family. Whoever I married, I wanted that person to bring ease and care for my mother, and Joseph has treated her with nothing but respect and kindness. He has showered her with bouquets of flowers, gifts, and sweets. We would have dinner with our parents over the weekend and my mother always surprised him with his favorite dishes or desserts and says no one has every complimented or appreciated her efforts as much as Joseph has.

Joseph has always encouraged me to be the best I can be in all aspects, with my family and friends, in school, and most importantly towards my beliefs and values. Joseph loves to give and never expects anything in return. As my husband, he helped me around the house, cleaning, cooking, and running errands. Every week, he would bring me flowers and small gifts to surprise me. He always compliments me and expresses caring and sweet sentiments. These little things have always made me feel appreciated and have motivated me to be a better wife to him. While all these things are very nice, maybe we fell short on creating a deeper and more substantial understanding with each other. These things are all surface level, and as husband and wife we can't go on like this without misunderstanding and conflict, such as the situation we currently face. This is not a one-sided problem, I

accept my fault in this as well because I am quiet and timid sometimes. I need to express more, ask more, and instead of avoiding or ignoring conflict, I need to take it head on. As we wait for the arrival of our son, his future is at stake by the choices we make now.

We found out we were expecting around November of 2015, and our due date is July 31<sup>st</sup> of this year. Joseph was so excited to learn he was going to be a father. He even thought of fun ways to tell our parents, and those have been some of my favorite memories with him. Even now, every night he asks me how is the baby, did I take my vitamins, how am I feeling, what did the doctor say? Joseph talks about how close and attached he is going to be, and is always planning different things to do with the baby. He is very present and excited to meet his son, and I have no doubt he is going to be an amazing father. The baby has been very uplifting and motivating through this entire process, it has cleared our intentions and encouraged us to do the best we can.

Joseph is very protective over his family. While we were courting and after we married he made sure to see his parents every week and to make them feel loved and appreciated. I do remember that despite trying to be close to his parents, he did not like them being involved in any of his decisions. He always wanted to make sure his decisions were based of Islamic standards and were not influenced by cultural or social views. I think that he didn't feel like he fit in with his parents and sisters and his interactions with me were very private and confined within our home, so he relied a lot on his friends to create a path for him. He was looking for validation, and unfortunately, his friend Mahmoud Elhassan and the others become a huge influence on Joseph.

Before Joseph was arrested I did not know about his radical beliefs. Because we share very traditional Muslim values, I always admired Joseph's desire to live consistently with the principles of Islam. When I first learned of his plan to travel to Syria, I assumed there was a mistake because there was nothing that Joseph ever said or did that raised any concern. Once I understood that it was true, I realized he had kept a very dangerous secret from me and it broke my heart because it felt like maybe I didn't even know the man I married. I was newly married and my husband was planning on leaving me. I have had to come to grips with this and re-evaluate my marriage. This has been a good process for me because I have gotten to know myself better and what I need, and I have demanded more from Joseph and he has responded well. Recently he told me a lot about his past that I never knew and how sad and lost he felt for so much of his life and how he felt that his family never understood him and that he did not belong anywhere. I have learned more about

Joseph since his arrest than before and now understand his crime was an expression of his longing to have an identity and to belong to something greater than himself. What is clear to me is that Joseph always felt like a disappointment to his family and that he could never live up to their expectations. Islam teaches us to be respectful of our parents no matter the circumstance of the relationship. Islam also teaches us to be charitable and thankful, and most importantly to be kind and accepting of others and their beliefs. These teachings are the core of Islam and are the beliefs our son will be born in to. He is not going to be surrounded by negativity or violent thoughts and behaviors. I would never allow anyone, even my husband, to teach him anything different than these core values and Joseph has assured me he wouldn't and that he rejects the extremist views he once held

I love Joseph very much and I am devoted and supportive of him no matter the outcome. I have forgiven him, because I know in his heart he is an honorable man, he has acknowledged his mistakes, and he has shown me he is committed to addressing his problems. I understand what we are facing and that it is harshest for Joseph, yet he is more worried and concerned about his family than he is himself. As we wait for sentencing I feel scared and anxious, because this decision will influence the next course of our life. It will not only affect Joseph and his family, but also an unborn child, who will be brought into this with not a single fault. Despite the circumstances, I know and trust that Joseph will be an affectionate, loving, and caring father. We are committed to putting our marriage and family back together. We will not make the same mistakes again or overlook any signs of trouble. I know in my heart that Joseph is a very kind, generous, strong, honest, and reliable person, and I hope you are able to see that too. More than anything, I pray you see that this crime is not who my husband is in his heart.



Saba Cheema

# **EXHIBIT L**

Dear Judge Trenga,

I am writing this letter about my brother-in-law Joseph Hassan Farrokh, who married my older sister Saba Cheema. I have known Joseph for several years and can tell you that he is an amazingly kind, gentle, and good man. After he met my sister and they became a couple, he joined our family and welcomed us into his. He has been kind and generous with me and my mother, and so very honorable. Since I've known him, Joseph has always tried to help others in anyway possible without thinking about what would happen to him as a result. In his work at the hospital, he cared for people who were in need of help and he was very kind to them. We did not understand why he quit his job at the hospital, when it happened, because he really expressed love working there.

Joseph has been a wonderful addition to our family. Over the past few years we have had regular family dinners, and Joseph would always bring my mother flowers and sweets. This meant a lot to my mother because she is from Pakistan and is very traditional. She does not speak very much English and does not have a large group of friends so when he showed my mother special attention, it really touched her heart. She never had a son and having Joseph as a son-in-law has filled her heart. When my sister was planning her wedding, I could see the way she and Joseph looked at each other and were excited about getting married. We were all very happy for them and knew they were a good match.

In all the time I have known I have never seen him act inappropriately or violently to anyone or in any situation. He has always been gentle, kind and mild. He has never shown a temper or acted in a way that was disrespectful.

I believe Joseph made a mistake. I also believe that he has realized what colossal error he was committing, and I hope that you will take this into account while making the decision for sentencing.

Thank you

Noor Cheema

*Noor Cheema*

# **EXHIBIT M**

July 5, 2016

To The Honorable Anthony Trenga:

My name is Iram Zafar and my daughter Saba is married to Joseph. Being a single mother, I have always felt extra cautious of who my daughters are with and around. When Saba first told me about Joseph, I was concerned about their relationship. Being so young, I did not want my daughter's feelings to be hurt or taken advantage of. I am from Pakistan and I do not speak fluent English, I was worried that this would create a hardship in my understanding with Joseph. Also knowing that Joseph had not completed any type of degree and was working in the mall made me hesitant. These are some of the many concerns I was going in with to my introduction with Joseph.

When I met Joseph he took away all of my concerns and worries. To my surprise he was not like anything I was expecting or imagined. Seeing him practice Islam and praying regularly was what made me trust and rely on him to be honest and sincere. He was able to prove to me that not only is he mentally and emotionally ready for a marriage, but also financially. I could see that Joseph was a positive influence on my daughter. He was kind and respectful towards her, as well as affectionate and expressive. While being such a strong man, he has a soft and gentle heart towards others. His smile and personality brighten up a room, and he has always created a positive atmosphere in our home. To me Joseph does not feel like my son-in-law, but like a son. He has always made me feel special and appreciated. He communicates with me politely and has always made sure I understand and am a part of the conversation. Each time Joseph has come over for dinner, he has never come empty handed. He surprises me with thoughtful gifts, with no reason other than making me smile. I feel very blessed that Joseph is married to my daughter and is in our lives.

From knowing Joseph and spending time with him, I was shocked and hurt by his actions. I never expected this is something that my daughter would be facing from such a loving and caring man. However, in my heart I trust Joseph to make up for his mistake. He has apologized to me and his words are very heartfelt and sincere. I know he regrets this deeply. We are completely supportive of Joseph, and pray he is home with us very soon. Both my daughters have felt the absence of a father, and I want to protect my grandson from the same heartbreak. Thank you for your consideration, I hope that you can see in Joseph what I have seen and felt.

Because my English is not strong I have written this letter and have asked my daughter to translate it for the Court.



Iram Zafar